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U.S. ENVIRONMENTAL PROTECTION AGENCY

TECHNICAL ENFORCEMENT SUPPORT
AT
HAZARDOUS WASTE SITES

CONTRACT NO. 68-W9-0007
TES X

Metcalf & Eddy, Inc.



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TECHNICAL ENFORCEMENT SUPPORT
AT
HAZARDOUS WASTE SITES**

TES X

**CONTRACT NO. 68-W9-0007
WORK ASSIGNMENT NO. R05043**

**INTERIM FINAL
PRELIMINARY REVIEW/VISUAL SITE INSPECTION (PR/VSI) REPORT
FOR
RCRA FACILITY ASSESSMENT (RFA)**

AT

**MILLCO CONSTRUCTION COMPANY
WORTHINGTON, OHIO
OHD986971422**

U.S. EPA REGION V

**METCALF & EDDY, INC.
PROJECT NO. 153043-0011-625**

WORK PERFORMED BY:

**METCALF & EDDY, INC.
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AUGUST 1993

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EXECUTIVE SUMMARY

As a part of the PR/VSI conducted at the request of U.S. EPA, Metcalf & Eddy conducted a preliminary review of federal and state file material for the Millco Construction Company facility (OHD986971422) and conducted a visual site inspection of the facility in order to summarize available information concerning the site and to assist the U.S. EPA in recommending further steps in the corrective action process. The Millco Construction Company is located at 700 Dearborn Park Lane in Worthington, Ohio. The facility is a construction and real estate development company specializing in warehouse and industrial development. Primary use of the property is for the storage of construction equipment and materials.

In October 1989, Millco unknowingly purchased aggregate contaminated with hazardous waste from Inorganic Recycling. This aggregate was stored on site and was intended for use as a road base. The stored material was sampled by OEPA, analyzed, and tested EP Toxic for chromium. The storage pile was classified as a F006 waste pile because it was derived from a listed waste. An F006 waste is comprised of wastewater treatment sludges from certain kinds of electroplating operations. Millco placed most of the waste pile of aggregate into five covered or partially covered roll-off boxes in late 1988 or early 1989. Aggregate and soil, surrounded by a circular berm, remains on the ground at the site. Brian Casey of Millco indicated that additional test results of the aggregate exhibited lead levels (71 ppm: probably total lead) above the detection limit. Water that accumulated in the bermed area was pumped into a holding tank in mid-1989. The water was analyzed and the City of Columbus granted permission to Millco to discharge the water to their wastewater treatment system. During the last year, the bermed area has again accumulated water. This water will be pumped into the holding tank still containing the water pumped from the bermed area. Because this water has yet to be retested, the holding tank which it will be pumped into was designated an Area of Concern.

Two Solid Waste Management Units (SWMUs) were tentatively identified based on the file review. These include the waste pile, the two roll-off boxes, and the area surrounding the roll-off boxes including the bermed area (see Table ES-1). Based on the VSI, the number of SWMUs did not change. An Area of Concern, the holding tank, was identified and added to the list.

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TABLE ES-1
MILLCO CONSTRUCTION COMPANY
CURRENT SOLID WASTE MANAGEMENT UNITS
AND AREAS OF CONCERN

Solid Waste Management Unit	Operational Dates	Release History
*Waste Pile Area	Approximately October 1988 to Present	Continuous
*Roll-offs	Possibly Late 1988 or Early 1989	Unknown
+Holding Tank	Possibly 1989 to Present	None

*Indicates SWMUs identified during the PR.
+Indicates AOC identified during the VSI.

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**PRELIMINARY REVIEW/VISUAL SITE INSPECTION (PR/VSI) REPORT
RCRA FACILITY ASSESSMENT (RFA)**

FACILITY NAME: **MILLCO CONSTRUCTION COMPANY
700 DEARBORN PARK LANE
WORTHINGTON, OHIO**

LATITUDE: 40° 07' 22"
LONGITUDE: 82° 58' 37"

SITE CONTACT: **ROBERT MILLER**
PHONE: **(614) 761-2533**
EPA ID #: **OHD 986971422**

1.0 INTRODUCTION

This section of the RCRA Facility Assessment (RFA) report covers the purpose and scope of the RFA process. It also describes the other sections of this report.

1.1 Background

This report was prepared by Metcalf & Eddy, Inc. under the Technical Enforcement Support (TES) X Contract, at the request of the United States Environmental Protection Agency (U.S. EPA), Region V. It describes the Preliminary Review (PR) of the file material for the Millco Construction Company (Millco) and the Visual Site Inspection (VSI) of the facility. These are the first two steps in conducting a Resource Conservation & Recovery Act (RCRA) Facility Assessment (RFA). The RFA is the first phase of the RCRA corrective action program and consists of a PR, VSI and, if appropriate, a sampling visit (SV). The report summarizes available information about the site and will assist the U.S. EPA in recommending further steps in the corrective action process.

The 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) provide new authorities for the U.S. Environmental Protection Agency (EPA) to compel owners and operators of hazardous waste treatment, storage and disposal facilities to take corrective actions for releases of hazardous wastes and hazardous constituents. These authorities apply to releases at facilities subject to the permitting requirements of RCRA Section 3005(e) and at facilities applying for RCRA permits. These amendments require EPA to address the need for corrective action for previously unregulated releases to air, surface water, soil, and

ground water, and to address the generation of subsurface gas. Section 3004(u) of RCRA allows EPA to require corrective actions after permit issuance through a schedule of compliance. Section 3008(h) allows EPA to require corrective actions to an enforcement action.

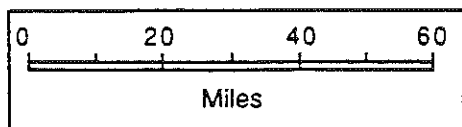
This report summarizes file information related to releases of hazardous waste at the Millco Construction Company facility located in Franklin County, Ohio (see Figure 1). Releases into all media are considered, including ground water, air, surface water and soils, and subsurface gas releases. All areas of potential release are considered, but the focus is on SWMUs.

A Solid Waste Management Unit (SWMU) is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators and underground injection wells.
- Closed and abandoned units.
- Recycling units, wastewater treatment units and other units that EPA has generally exempted from standards applicable to hazardous waste management units.
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas.

An Area of Concern (AOC) is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a non-routine or non-systematic basis. This includes any area where such a release in the future is judged to be a strong possibility. The list and description of the SWMUs and AOCs in the report may not be all inclusive. Furthermore, the fact that a SWMU was not identified in the report does not affect U.S. EPA's authority for corrective action for SWMUs which may not be contained in the report.



COUNTY LOCATION
MILLCO CONSTRUCTION COMPANY

Project Number
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Figure 1

The central purpose of an RFA is to identify releases or potential releases requiring further investigation. According to EPA's RFA Guidance Document, the four purposes of an RFA are as follows:

1. To identify and gather information on releases at RCRA-regulated facilities.
2. To evaluate SWMUs and other AOCs for releases to all media and to evaluate regulated units for releases to media other than ground water.
3. To make preliminary determinations regarding releases of concern and the need for further actions and interim measures at the facility.
4. To screen from further investigations those SWMUs that do not pose a threat to human health and the environment.

The Millco Construction Company is a construction and real estate development company which specializes in warehouse and industrial development. The company's headquarters are located in Dublin in Franklin County, Ohio (Figure 1). In October 1988, Millco Development purchased aggregate to be used as a parking lot base at their Millco Development Company site (which is where Millco also houses their equipment), located at the corner of Sancus Boulevard and Dearborn Park Road in Worthington, Ohio. The aggregate was purchased from Inorganic Recycling and was found to contain high levels of hexavalent chromium (EP Toxicity of up to 85 ppm) (6).

M&E performed a review of Millco's files at the Ohio Environmental Protection Agency (OEPA) Central District Office located in Columbus, Ohio, and the U.S. EPA Region V RCRA files located in Chicago, Illinois. Two Solid Waste Management Units (SWMU) (See Table 1) were tentatively identified based on the review. M&E performed the VSI on August 16, 1990, to verify the existence of the SWMUs and to identify any other SWMUs or areas of concern. The M&E site inspection team consisted of Mary Beth Smrecansky (Chemist) and Lisa Allinger (Senior Environmental Scientist). The M&E team was accompanied by Jennifer Hille of the OEPA. Inspection personnel were met by Brian Casey, Vice President of Millco Construction Company and Doug Beechi, Millco Construction Company. Based on the VSI, the number of SWMUs did not change. An area of concern, the holding tank for water pumped from the bermed area, was noted during the VSI. Also, additional test results were provided by Brian Casey which indicated the presence of lead (up to 71 ppm; whether total or EP Toxicity is unknown, but probably total lead) in the aggregate material.

TABLE 1

**MILLCO CONSTRUCTION COMPANY
SOLID WASTE MANAGEMENT UNIT AND AREA
OF CONCERN SUMMARY TABLE**

Solid Waste Management Unit	Operational Dates	Release History
Waste Pile Area	Approximately October 1988 to Present	Continuous
Roll-offs	Possibly Late 1988 or Early 1989	Unknown
Holding Tank	Possibly 1989 to Present	None

1.2 Permit History

No Part A or Part B permits have been submitted for this facility. No air or NPDES permits are known to be required.

1.3 Enforcement History

Jennifer Hille of the Ohio Environmental Protection Agency (Ohio EPA) stated that prior to Inorganic Recycling selling the aggregate to Millco, Ohio EPA was questioning the potential hazardous content of the aggregate. Once it was discovered that the aggregate was purchased by Millco, it was sampled by OEPA, subjected to the EP Toxicity test, and failed for chromium. Ohio EPA then designated the stored aggregate a F006 waste pile as a result of being derived from a listed hazardous waste. An F006 waste is comprised of wastewater treatment sludges from certain kinds of electroplating operations (12).

On July 6, 1989, Ohio EPA issued Findings and Orders to Millco regarding the disposal of hazardous waste in storage at the Millco facility and closure requirements for the areas where hazardous wastes are held (15). A Closure Plan for the Millco facility was submitted to Ohio EPA on March 14, 1990 (23) and was disapproved (25). A Notice of Deficiency for the Closure Plan was sent to Millco on June 15, 1990 (27). According to Jennifer Hille, Ohio EPA, Millco resubmitted a closure plan which has been approved and is currently cleaning up the site (29).

1.4 Project Description and Report Format

This RFA report consists of six sections and three appendices. The information contained in the report is designed to give the reader a thorough description of site-specific and area conditions at the facility, and to provide information on individual units at the site. The following sections of the report are outlined below.

Section 2.0 describes the facility and its operations by providing general facility information, process information, waste management practices, and regulatory status of SWMUs at the site.

Section 3.0 provides information on the general environmental setting in the immediate area and in the region where the facility is located. The climate, surface water, ground water, soils, geology and land use in the vicinity of the site are described in this section.

Section 4.0 presents unit-specific information on SWMUs and AOCs. For each SWMU and AOC the following are provided: description of the unit, current status, waste types and management, release controls, release history, and VSI observations.

Section 5.0 provides recommendations for further action. Included is a summary table for all SWMUs and AOCs identified during the RFA.

Section 6.0 provides conclusions, including the potential for releases from each SWMU and AOC.

Finally, the Appendices contain photographs taken during the visual site inspection, analytical data obtained, if available, and field notes.

2.0 GENERAL DESCRIPTION OF FACILITY AND PROCESSES

The Millco Construction Company is a construction and real estate development company specializing in warehouse and industrial development. Primary use of the Millco property is for the storage of construction equipment and materials.

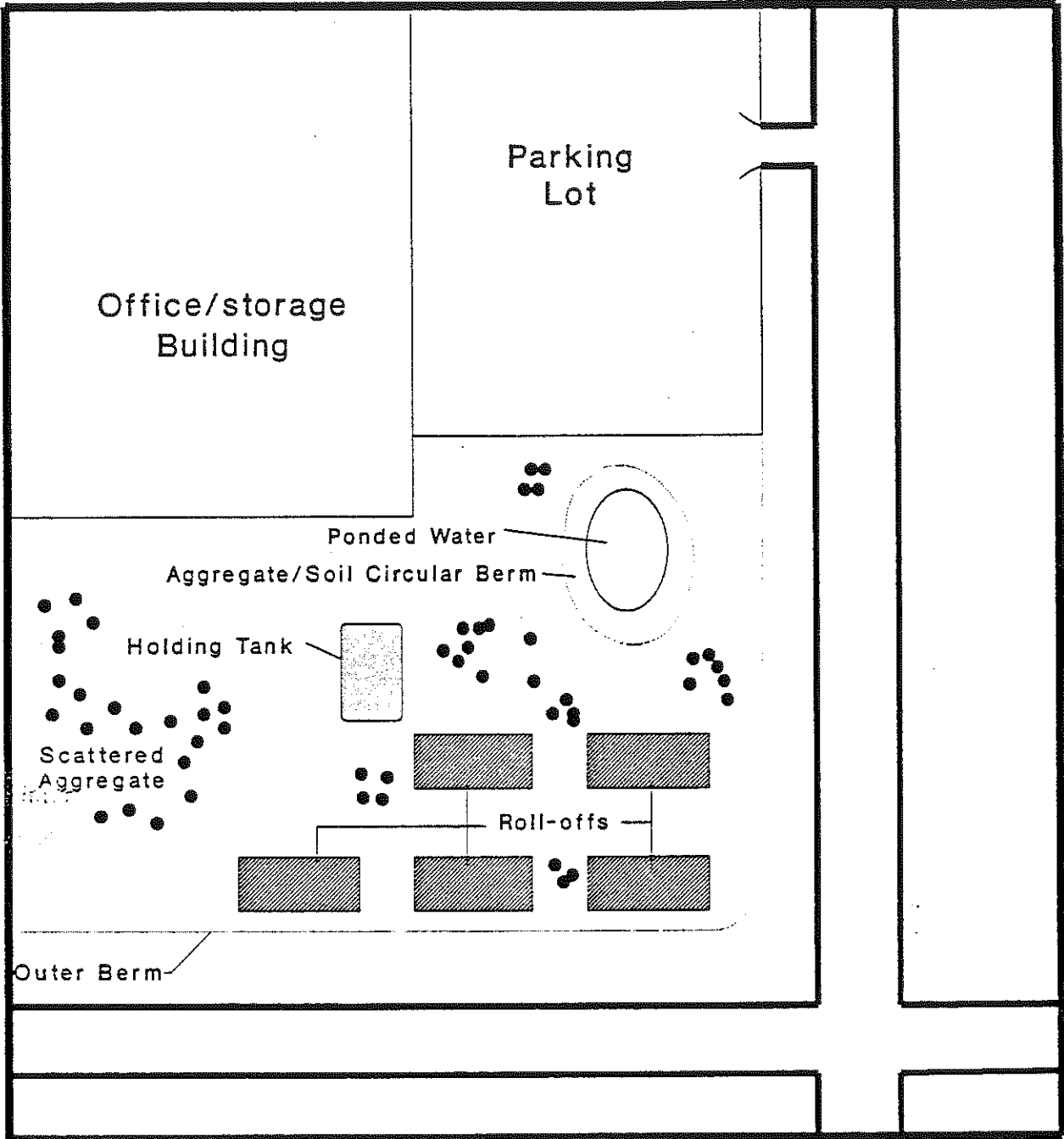
2.1 Facility Location and Operation

Millco's corporate offices are located at 437 Tuller Road in Dublin, Ohio. A subsidiary of Millco, Millco Development, purchased aggregate from Inorganic Recycling and had it delivered to their leasing address at 700 Dearborn Park Lane in Worthington, Ohio. This property is at the southwest corner of Sancus Boulevard and Dearborn Park Lane, just west of 7469 Worthington-Galena Road (see Figure 2). The site is located across the street from Inorganic Recycling.

The Millco site is located in a primarily commercial/industrial zone, with a residential area located approximately one-quarter to one-half mile to the south. The area is relatively flat and no streams were observed near the site. Worthington has a population of 15,016 (30).

The aggregate purchased by Millco from Inorganic Recycling was recycled from an F006 waste. The Ohio EPA collected samples of the waste pile at the Millco site. These samples contained high levels of hexavalent chromium (EP Toxicity of up to 85 ppm) (6). Because this aggregate was derived from a F006 waste, the stored material was also designated by Ohio EPA as a F006 waste pile. When the aggregate was brought onto the site, it was placed on the ground in piles on the north

North ↑



"Not to Scale"



SITE MAP
MILLCO CONSTRUCTION COMPANY
WORTHINGTON, OHIO

Project Number
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Figure 3

and northeastern portions of the property. After the aggregate was designated an F006 waste, most of the aggregate was scraped into a pile and placed into five roll-off containers on the east side of the property. Two of the roll-off boxes are completely covered with tarps and two roll-off boxes are partially covered. One roll-off box has no cover on it and has trash, such as boards and paper, piled on top of the aggregate. A circular berm of mixed aggregate and soil remains where the pile was located (see Figure 3). Plastic was placed over the remains of the pile to keep water out. The plastic is now torn and water has accumulated inside the berm.

3.0 ENVIRONMENTAL SETTING

This section describes the environmental setting of the Millco facility, including a description of the geology, hydrogeology and climate/meteorology of the central Ohio area in which the facility is located.

3.1 Geology

The bedrock found in Franklin County is of marine sedimentary origin and consists primarily of dolomite, limestone, shale and sandstone (28). The bedrock beneath the site is shale. The facility area was glaciated extensively during the Pleistocene. Although there is no site specific data available, it is likely that the surficial geology is a result of this glaciation. These glacial deposits are composed primarily of a slightly weathered, yellow to buff brown glacial till (28).

3.2 Hydrogeology

There was no information on hydrogeology at the site in any of the U.S. EPA or Ohio EPA files. No known wells are located in the area. At the time of the VSI, no known research had been conducted at the site.

3.3 Climate

The climate and meteorology is typical of central Ohio. Precise meteorological data was not obtained, but rainfall maps prepared by the Soil Conservation Survey in Ohio indicate that the average annual rainfall is approximately 38.12 inches and the average temperature is 51.8 degrees Fahrenheit in central Ohio. The prominent wind direction is from the south-southwest.

3.4 Pollutant Releases Into Ground Water

There has been no monitoring or sampling of ground water at the Millco Construction Company facility. The ground water is estimated to be 10 to 15 feet below the ground surface. The potential for the movement of chromium and lead contaminants into the ground water exists if either the ground water table of the aquifer or a perched water table intercepts the contaminated soil. Contaminant migration from dissolved analytes percolating through the unsaturated zone during storm events is also feasible.

3.4.1 Monitoring Data

Facility personnel are not aware of any ground water sampling performed at the site.

3.4.2 Potential Receptors

According to the Jennifer Hille, Ohio EPA, the City of Columbus Water System is the source of drinking water for the area. The portion of the City of Columbus Water System that services this area is a surface water system. No known wells are located in the area. The potential exists for contaminated ground water to affect surface water quality within a local or regional discharge area. Potential receptors are any people, animals or biota living in or using the water.

3.5 Pollutant Releases Into Surface Water

Analysis of the extract from the waste pile of aggregate has shown high levels of chromium (up to 85 ppm) (6), and the aggregate has also exhibited elevated lead levels (71 ppm; whether total lead or EP Toxicity is unknown per Brian Casey of Millco, but probably total lead). The pile of aggregate is located in a vacant lot. After the majority of the waste pile was removed and placed into roll-off boxes, a portion of the excavation (a circular berm of aggregate and soil) was left uncovered. This allowed surface water to accumulate within the bermed area. Facility personnel said this water was transferred into an on-site holding tank. The excavated area is now covered with plastic sheeting to help prevent the accumulation of surface water. However, the plastic sheeting is torn and consequently water has accumulated in the bermed area.

3.5.1 Monitoring Data

According to Jennifer Hille of OEPA, an analysis was conducted on samples from the aforementioned holding tank containing surface water pumped from the bermed area. During the VSI, Jennifer Hille (OEPA) stated that the hexavalent chromium levels from the holding tank were low enough to allow disposal of the material via discharge to the City of Columbus wastewater treatment plant. No data is available for the surface water which has accumulated in the bermed area.

3.5.2 Potential Receptors

Potential receptors of the surface water are the ground water users, if any, should there be any direct hydrological connection of the surface and ground water. In addition, any humans, animals or biota living in or using the water would be a potential receptor.

3.6 Pollutant Releases Into Air

Most of the chromium and lead contaminated aggregate has been placed in five roll-off containers and, with the exception of one roll-off, has been covered or partially covered. The roll-off container which is not covered has also been used as a trash container. This trash/debris covering also serves to minimize emissions from the aggregate.

3.6.1 Monitoring Data

The facility personnel are not aware of any air monitoring data collection being performed at this site.

3.6.2 Potential Receptors

There has been no data to support the existence of gaseous pollutants.

3.7 Pollutant Releases Into Soil

The chromium and lead contaminated aggregate was purchased and transported to the site in October 1988. Therefore, the aggregate material sat on the native soil for approximately 1.5 years before being identified as hazardous, collected, and stored in the roll-off containers. In addition, 145 cubic yards of material were purchased and only approximately 100 cubic yards are stored in roll-off boxes. Therefore, some of the contaminated aggregate is still exposed on the surface at the site.

3.7.1 Monitoring Data

EP Toxicity analyses of aggregate/soil samples conducted in October 1988 indicated concentrations of up to 85 ppm of chromium (6). In addition, soil sampling was conducted on August 3, 1990 at the request of Millco's banking institution. These samples were analyzed for chromium and lead. Both analytes were found to be above farm soil ranges. Chromium levels were above background (not provided or available in records) and lead levels were 71 ppm (whether total or EP Toxicity is unknown, but analyses were probably total chromium and lead). This information was provided by Brian Casey of Millco during the VSI.

3.7.2 Potential Receptors

Potential receptors on-site are any biota, ground water (e.g., via migration of contamination from dissolved analytes percolating through unsaturated zones during storm events) or surface water which has come in contact with the contaminated soil. The site is not fenced, thus the contaminated area is accessible to the public.

3.8 Releases of Gaseous Pollutants Into Subsurface Soil

3.8.1 Monitoring Data

No gas monitoring has been conducted.

3.8.2 Potential Receptors

There has been no data to support the existence of gaseous pollutants.

4.0 DESCRIPTION OF SOLID WASTE MANAGEMENT UNITS (SWMUs)

This section contains file review information supplemented by results of the VSI and telephone conversations with facility representatives.

4.1 Unit Type: Waste Pile Area

Regulatory Status: SWMU. Inactive aggregate waste pile area. This area is shown on Figure 3.

A. Unit Description: The waste pile area consists of aggregate which was purchased from Inorganic Recycling for use as a parking lot base (1). The material was originally stored as six piles in an area that was designated to be a parking lot. This lot was to be constructed at the northern and eastern portion of the land, adjacent to the existing building on site. Most of this material was later placed into five roll-off boxes located to the south of the designated parking lot. Millco bermed this material to reduce surface water runoff (see Photograph 1, Appendix A). Water accumulated in the area contained by the berm. This water was pumped into an adjacent 5,000 gallon holding tank (refer to 4.3 for further explanation of this Area of Concern). The material remaining within the bermed area was then covered with plastic. However, the plastic has since torn in several places and water has once again accumulated within the bermed area (Photograph 3, Appendix A).

B. Age: 2 years.

Period of Operation: The waste pile aggregate was purchased from Inorganic Recycling in October 1988.

C. Waste Type: Aggregate pile "recycled" from a F006 hazardous waste.

Waste Volume/Capacity: Approximately 145 cubic yards of material were purchased. Each of the five roll-off boxes used to store the aggregate hold 20 cubic yards, for a total of 100 cubic yards. Therefore, some aggregate is still scattered over approximately one acre of the property and some material remains within the bermed area.

Waste Constituents: The waste contains high concentrations of hexavalent chromium (EP Toxicity of up to 85 ppm) (6) and lead (71 ppm; whether total or EP Toxicity is unknown, but probably total lead) (Brian Casey of Millco).

- D. Release Controls: The circular berm contains a mixture of aggregate and the surrounding soil. There are cracks in the berm which contain water and the plastic covering the circular berm is torn which has resulted in additional water accumulation.
- E. Release History: The aggregate material has been exposed since its placement on-site.
- F. VSI Observations: Aggregate was scattered across the surface of the soils in the waste pile area located on the south and southwestern portion of the site. This area is south of the building located on-site. The circular berm wall of material has cracks on the outside (Photograph 4, Appendix A). The condition of the inside wall of the berm was concealed. Water has collected inside the berm, as seen through the top of the torn plastic in Photograph 3, Appendix A.
- G. Sample Results: Sample results, obtained at the request of the bank affiliated with Millco, were shown to OEPA and M&E personnel during the VSI. According to Brian Casey of Millco, the bank personnel did not want copies of these results distributed. These results not only provided additional evidence of chromium contamination (confirmed above background levels), but elevated levels of lead were also found (according to Brian Casey of Millco 71 ppm; whether total or EP Toxicity is unknown, but probably total lead).

4.2 Unit Type: Roll-offs

Regulatory Status: SWMU. See Figure 3 for location of the roll-off boxes. These containers are shown in photographs 5 and 6 in Appendix A.

- A. Unit Description: There are five roll-offs located within the waste pile area. Each has a capacity of 20 cubic yards (approximately 145 cubic yards of F006 material was purchased in October 1988). Two of the roll-off boxes are completely covered and two are partially covered with a tarp. One of the roll-off boxes has trash piled on top of the aggregate and has no cover. OEPA has told Millco several times to put a cover on the unit. At least one of the roll-offs is very rusty. The hazardous labels are missing or faded on some of the roll-off boxes. Aggregate material is scattered around the exterior of the roll-off boxes.
- B. Age: Possibly 1 1/2 years.
Period of Operation: Possibly late 1988 or early 1989, until present.

- C. **Waste Type:** Aggregate "recycled" from a F006 hazardous waste.

Waste Volume/Capacity: The material is contained in five roll-off boxes, each with a capacity of 20 cubic yards.

Waste Constituents: The aggregate waste contains high concentrations of hexavalent chromium (EP Toxicity of up to 85 ppm) (6) and lead (71 ppm; whether total or EP Toxicity is unknown, but probably total lead) (Brian Casey of Millco). One roll-off has trash piled on top of the aggregate material.

- D. **Release Controls:** Two of the roll-off boxes are completely covered with tarps and two roll-offs are only partially covered with tarps. One roll-off box is completely uncovered and has trash on top of the aggregate material. One roll-off box is particularly worn and rusty.
- E. **Release History:** Unknown. There is a potential that dust could be blown into the air from uncovered or partially exposed roll-offs. A hard rain could cause overflow of material onto the ground.
- F. **VSI Observations:** Only two of the roll-offs were completely covered with tarps. One was uncovered and filled with trash. One roll-off in particular looked very worn and rusty. Aggregate was scattered around the base and in between the roll-offs.
- G. **Sample Results:** No additional sample results were provided by facility personnel.

4.3 Unit Type: Holding Tank

Regulatory Status: Area of Concern. See Figure 2 for location of the holding tank. The holding tank is shown in Photograph 6, Appendix A.

- A. **Unit Description:** A 5,000 gallon holding tank is being used to store the water pumped from the bermed area that remained after most of the aggregate material was placed into roll-off boxes (Photograph 7, Appendix A). The tank sits adjacent to both the bermed area and the roll-off boxes.
- B. **Age:** Possibly 1 year.
Period of Operation: Approximately 1989 to present.

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- C. Waste Type: The holding tank contains the water that was pumped from the bermed area in mid-1989 (conversation with Jennifer Hille of Ohio EPA, during VSI on August 16, 1990).

Waste Volume/Capacity: The tank has a holding capacity of 5,000 gallons. Brian Casey of Millco stated that the water removed from the bermed area filled about half of the 5,000 gallon tank.

Waste Constituents: Jennifer Hille stated that the water was tested for disposal in mid-1989. Jennifer Hille also stated that the City of Columbus had approved release of this water to their wastewater treatment plant. Additional water has accumulated within the bermed area since water was pumped out in mid-1989. This water has been standing there for a period of time.

- D. Release Controls: The tank is not capped. There is no secondary containment.
- E. Release History: None.
- F. VSI Observations: The tank appears to be in good condition. There is no evidence of any releases.
- G. Sample Results: Sample results for this unit were not available from facility personnel.

5.0 SUMMARY AND RECOMMENDATIONS

The principal environmental concerns at the Millco Construction Company's waste pile site are the soil contamination and potential ground water and surface water contamination associated with the aggregate waste pile. Listed below are the recommended sampling points, parameters for analysis and other actions necessary to complete the unit investigation.

1. Waste Pile Area - Although soil sampling has indicated chromium contamination (6) in the undeveloped parking area on the north and northeastern part of the site, additional sampling at the request of Millco's bank resulted in the discovery of elevated levels of lead (Brian Casey during VSI on August 16, 1990). Additional soil samples should be collected at certain points to determine the boundaries, types, and degrees of contamination. In addition, several samples should be collected in the waste pile area, including the "pit" and

outside the circular berm of the pit and around the dumpsters (the aggregate material was there before the dumpsters). These samples should be collected at various depths to confirm whether any contaminant migration has occurred. At a minimum, analytical parameters should include chromium and lead. It may be further necessary to test for all compounds listed on the RCRA Appendix IX List.

2. Roll-Offs - Soil and ground water sampling is recommended around and beneath the roll-offs once they are removed (described in Number 1, above). At a minimum, analytical parameters should include chromium and lead and it may be further necessary to test for all compounds listed on the RCRA Appendix IX List. Concentrations of chromium and lead have been confirmed.
3. Holding Tank - The water already contained within the holding tank was sampled and considered acceptable for release to the City of Columbus' wastewater treatment plant. However, additional water that has accumulated within the walls of the circular berm since the "pit" was pumped out (mid-1989) may have become contaminated from standing in a contaminated confinement. The surface water remaining within the bermed area should be sampled before it is pumped into the holding tank. This sampling might preclude the possibility of contaminating the water in the holding tank with possibly higher concentrations of hazardous constituents. If the accumulated surface water is pumped into the holding tank before it is sampled, the water in the holding tank should be analyzed again before it is released to the wastewater treatment plant. At a minimum, analytical parameters should include chromium and lead and it may be further necessary to test for all compounds listed on the RCRA Appendix IX List. Table 2 lists all SWMUs and AOCs, operational dates, release history and suggested further action.

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TABLE 2

MILLCO CONSTRUCTION COMPANY
CURRENT SOLID WASTE MANAGEMENT UNITS

Solid Waste Management Unit	Operational Dates	Release History	Suggested Further Action
Waste Pile Area	Approximately October	Continuous 1988 to Present	Soil sampling to confirm if migration has occurred.
Roll-offs	Possibly Late 1988 or Early 1989	Unknown	Soil sampling to confirm if migration has occurred.
Holding Tank	Possibly 1989 to Present	None	Surface water sampling of water in bermed waste pile area (prior to addition to tank),

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6.0 CONCLUSIONS

The PR/VSI identified two SWMUs and one AOC at the Millco Construction Company. Background information on the facility's location, operation, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Sections 2.0 and 3.0. SWMU- and AOC-specific information such as the unit's description, dates of operation, wastes managed, release controls, release history and observed conditions is discussed in Section 4.0.

The following paragraphs summarize the environmental concerns at the facility. Table 2 (Section 5) identified the SWMUs and AOCs at the Millco facility and suggested further action to be taken.

SWMU 1 - Waste Pile Area

This unit consists of a waste pile area containing aggregate to be used as parking lot base. The aggregate was contaminated with hexavalent chromium and lead.

The soil is already contaminated with chromium and lead. Aggregate can still be found on the ground in and around the circular berm and under the roll-offs. The level of the water table and the presence of an existing aquifer are unknown. Because this information is unknown, there is potential for release of contaminants to the ground water. The aggregate material was first stored in six separate piles. The piles were then combined into one large pile and covered with plastic. Most of the one large pile was excavated and the material was stored in roll-off containers. When the material was excavated, a circular berm was built around the excavated depression to capture runoff. The bermed area still contains an uncovered percentage of the hazardous material. Therefore, due to the exposure and movement of surface water through the aggregate material over time (e.g., leaching, runoff), there is a high potential for release of contaminants into the soil.

The impounded water may be contaminated from the aggregate/soil mixture due to the fact that some of the water may have been contained there for over one year. No other surface water was noted within the vicinity of the waste pile area. Storm sewers may possibly be located in the parking lot adjacent to the berm, but none were located. Although there were no bodies of water observed in the area during the VSI (except for the water that has collected in the circular berm), there is a potential for release from normal area surface runoff.

There is minimal potential for release to air. The release potential of fugitive emissions of hexavalent chromium and lead from the residuals waste pile is minimal because the material is

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covered or partially covered. If this material would become airborne, receptors would be those people or animals which could inhale the material.

There is minimal potential for release of subsurface gas.



SWMU 2 - Roll-Offs

This unit consists of five roll-offs located within the waste pile area. Two of the roll-offs are completely covered with tarps, one roll-off is uncovered but has trash on top, and two are partially covered with tarps. One roll-off is worn and rusty.

There should be no additional threat to the soil or ground water from the material in the containers unless rain would wash uncovered material onto the ground. The ground beneath the roll-offs already has aggregate spread throughout. The potential for contaminant release into the ground water exists through contact with the water table or percolation of dissolved analytes through the unsaturated zone. The aggregate material was first stored in six separate piles. The piles were then combined into one large pile and covered with plastic. Most of the one large pile was excavated and the material was stored in roll-off containers. When the material was excavated, a circular berm was built around the excavated depression to capture surface water runoff. The berm area still contains an uncovered percentage of the hazardous material. Therefore, due to the exposure and movement of water through the aggregate material over time (e.g., leaching, runoff), there is potential for release of contamination into the soil.

There is minimal potential for release to surface water because there is no known body of water nearby (except the water accumulating within the circular berm of aggregate and soil). Although there were no bodies of water observed in the area during the VSI, there is a potential for release from normal area surface runoff.

There is low potential of release to the air from uncovered material in the roll-offs. The release potential of fugitive emissions of hexavalent chromium and lead from the residual waste pile is low because the material is covered or partially covered. If this material would become airborne, receptors would be those people or animals which could inhale the material.

There is low potential for release of subsurface gas. The release potential of gaseous pollutants from the chromium and lead contaminated soil to the air is minimal since inorganic metals tend not

to occur in a gaseous phase. There is no potential for release of organics to the air, providing that no organics are present.

Area of Concern - Holding Tank

This unit is a 5,000-gallon holding tank to store water which accumulated in the bermed area.

There is minimal potential threat to soil or ground water because the water presently contained within the holding tank is not considered hazardous according to City test results, and the tank appears to be in good condition.

There is minimal potential for release of contaminants to surface water.

There is minimal potential release of contaminants to the air.

There is minimal potential for release of subsurface gas.

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APPENDIX A

VISUAL SITE INSPECTION PHOTO LOG



PHOTOGRAPH 1: Circular berm of aggregate and soil remaining from previous waste pile.
Date: August 16, 1990



PHOTOGRAPH 2: Residuals of aggregate that remain from incomplete removal of waste pile (base of a roll-off).
Date: August 16, 1990



PHOTOGRAPH 3: Torn cover of remaining circular berm of aggregate and soil that was part of the waste pile.
Date: August 16, 1990



PHOTOGRAPH 4: Cracks in remaining aggregate and soil berm which contains water.
Date: August 16, 1990



PHOTOGRAPH 5: Roll-offs.
Date: August 16, 1990



PHOTOGRAPH 6: Trash-filled roll-off
(holding tank in background).
Date: August 16, 1990

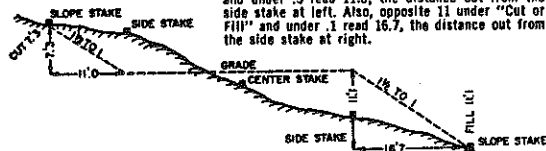


PHOTOGRAPH 7: Holding tank (background).
Date: August 16, 1990

DISTANCES FROM SIDE STAKES FOR CROSS-SECTIONING

Roadway of any Width. Side Slopes 1½ to 1.

In the figure below: opposite 7 under "Cut or Fill" and under .3 read 11.0, the distance out from the side stake at left. Also, opposite 11 under "Cut or Fill" and under .1 read 16.7, the distance out from the side stake at right.



	0	.1	.2	.3	.4	.5	.6	.7	.8	.9	
Cut or Fill	Distance out from Side or Shoulder Stake										Cut or Fill
0	0.0	0.2	0.3	0.5	0.6	0.8	0.9	1.1	1.2	1.4	0
1	1.5	1.7	1.8	2.0	2.1	2.3	2.4	2.6	2.7	2.9	1
2	3.0	3.2	3.3	3.5	3.6	3.8	3.9	4.1	4.2	4.4	2
3	4.5	4.7	4.8	5.0	5.1	5.3	5.4	5.6	5.7	5.9	3
4	6.0	6.2	6.3	6.5	6.6	6.8	6.9	7.1	7.2	7.4	4
5	7.5	7.7	7.8	8.0	8.1	8.3	8.4	8.6	8.7	8.9	5
6	9.0	9.2	9.3	9.5	9.6	9.8	9.9	10.1	10.2	10.4	6
7	10.5	10.7	10.8	11.0	11.1	11.3	11.4	11.6	11.7	11.9	7
8	12.0	12.2	12.3	12.5	12.6	12.8	12.9	13.1	13.2	13.4	8
9	13.5	13.7	13.8	14.0	14.1	14.3	14.4	14.6	14.7	14.9	9
10	15.0	15.2	15.3	15.5	15.6	15.8	15.9	16.1	16.2	16.4	10
11	16.5	16.7	16.8	17.0	17.1	17.3	17.4	17.6	17.7	17.9	11
12	18.0	18.2	18.3	18.5	18.6	18.8	18.9	19.1	19.2	19.4	12
13	19.5	19.7	19.8	20.0	20.1	20.3	20.4	20.6	20.7	20.9	13
14	21.0	21.2	21.3	21.5	21.6	21.8	21.9	22.1	22.2	22.4	14
15	22.5	22.7	22.8	23.0	23.1	23.3	23.4	23.6	23.7	23.9	15
16	24.0	24.2	24.3	24.5	24.6	24.8	24.9	25.1	25.2	25.4	16
17	25.5	25.7	25.8	26.0	26.1	26.3	26.4	26.6	26.7	26.9	17
18	27.0	27.2	27.3	27.5	27.6	27.8	27.9	28.1	28.2	28.4	18
19	28.5	28.7	28.8	29.0	29.1	29.3	29.4	29.6	29.7	29.9	19
20	30.0	30.2	30.3	30.5	30.6	30.8	30.9	31.1	31.2	31.4	20
21	31.5	31.7	31.8	32.0	32.1	32.3	32.4	32.6	32.7	32.9	21
22	33.0	33.2	33.3	33.5	33.6	33.8	33.9	34.1	34.2	34.4	22
23	34.5	34.7	34.8	35.0	35.1	35.3	35.4	35.6	35.7	35.9	23
24	36.0	36.2	36.3	36.5	36.6	36.8	36.9	37.1	37.2	37.4	24
25	37.5	37.7	37.8	38.0	38.1	38.3	38.4	38.6	38.7	38.9	25
26	39.0	39.2	39.3	39.5	39.6	39.8	39.9	40.1	40.2	40.4	26
27	40.5	40.7	40.8	41.0	41.1	41.3	41.4	41.6	41.7	41.9	27
28	42.0	42.2	42.3	42.5	42.6	42.8	42.9	43.1	43.2	43.4	28
29	43.5	43.7	43.8	44.0	44.1	44.3	44.4	44.6	44.7	44.9	29
30	45.0	45.2	45.3	45.5	45.6	45.8	45.9	46.1	46.2	46.4	30
31	46.5	46.7	46.8	47.0	47.1	47.3	47.4	47.6	47.7	47.9	31
32	48.0	48.2	48.3	48.5	48.6	48.8	48.9	49.1	49.2	49.4	32
33	49.5	49.7	49.8	50.0	50.1	50.3	50.4	50.6	50.7	50.9	33
34	51.0	51.2	51.3	51.5	51.6	51.8	51.9	52.1	52.2	52.4	34
35	52.5	52.7	52.8	53.0	53.1	53.3	53.4	53.6	53.7	53.9	35
36	54.0	54.2	54.3	54.5	54.6	54.8	54.9	55.1	55.2	55.4	36
37	55.5	55.7	55.8	56.0	56.1	56.3	56.4	56.6	56.7	56.9	37
38	57.0	57.2	57.3	57.5	57.6	57.8	57.9	58.1	58.2	58.4	38
39	58.5	58.7	58.8	59.0	59.1	59.3	59.4	59.6	59.7	59.9	39
40	60.0	60.2	60.3	60.5	60.6	60.8	60.9	61.1	61.2	61.4	40

McE
2800 Corporate Ex. Blvd.
Suite 250
Columbus Ohio 43231

(614) 890-5501

OEPA Contact: Jennifer
Hille
771-7505

Millco: Bob Miller
761-2533
Doug
848-6351



"Rite in the Rain"

The paper in this book has been treated by an exclusive chemical waterproofing process. Wet or dry, even the hardest pencil will produce a clean, sharp mark.

KEUFFEL & ESSER CO.

August 16, 1990

9:00 M&E Personnel
arrived on-site

- Mary Beth Muller-Curasky
- Lisa Allinger

EPA Representatives
Jennifer Miller is
present.

Miller Personnel

- Brian Casey
- Doug Beechey

5 roll offs on-site
all roll offs contain
the aggregate brought
from Inorganic

Recycling. One of
the roll offs is not
covered and also
contains trash.

There is a tank
(~10,000 gal) on-site
to be used to
pump any water that
accumulates in the
pit. The pit is
covered w/ plastic.

Mary Beth Muller-Curasky 8/16/90

Mary Beth Muller-Curasky 8/16/90

Testing of soil near
the building was
requested by the
bank and the testing
was done August
3rd. The samples were
analyzed for Total
Chromium and total
lead. The levels of
Chromium were
within the farm
soils. Range soils
were slightly
higher. The lead
levels were ok.
except one which
was 71 ppm.

Mary Beth Amecaroty 8/16/90

M:E will recommend
sampling in the
pit where the roll
offs are and around
the perimeter of the
pit (diked area)

Miller Properties
owns the land and
it is ~ 5 acres.

A new closure
plan was submitted
to the OSHA by
Cleveland Fluid
Systems (CFS).

Mary Beth Amecaroty 8/16/90



November 13, 1991

Ms. Sheri Bianchin
United States Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

**Re: Work Assignment No. R05043
Draft PR/VSI Reports**

Dear Ms. Bianchin:

Enclosed is the Draft Preliminary Review/Visual Site Inspection (PR/VSI) Report for the following sites:

Millco Construction Company
R&D Chemical Company

Please note that we do not have the photographs nor the log book for the Millco Construction Company and the R&D Chemical Company site. Also enclosed are the EPA review comments on the original report submitted for the Millco Construction Company site and the R&D Chemical Company site. Upon receipt of this information we will be happy to bind this documentation into the report.

If you have any questions or require additional information, please feel free to contact me at (312) 553-1400.

Sincerely,

METCALF & EDDY, INC.

Thomas Lentzen
Regional Project Manager

Enclosure

cc: F. Norling
File

U.S. ENVIRONMENTAL PROTECTION AGENCY

TECHNICAL ENFORCEMENT SUPPORT
AT
HAZARDOUS WASTE SITES



CONTRACT NO. 68-W9-0007
TES X

Metcalf & Eddy, Inc.



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EXECUTIVE SUMMARY

As a part of the PR/VSI conducted at the request of U.S. EPA, Metcalf & Eddy conducted a preliminary review of federal and state file material for the Millco Construction Company facility (OHD986971422) and conducted a visual site inspection of the facility in order to summarize available information concerning the site and to assist the U.S. EPA in recommending further steps in the corrective action process. The Millco Construction Company is located at 700 Dearborn Park Lane in Worthington, Ohio. The facility is a construction and real estate development company specializing in warehouse and industrial development. Primary use of the property is for the storage of construction equipment and materials.

In October 1989, Millco unknowingly purchased aggregate contaminated with hazardous waste from Inorganic Recycling to be used as a road base. This aggregate was suspected by Millco to be contaminated with hazardous waste. The stored material was sampled by OEPA and analyzed and tested EP Toxic for chromium. The storage pile was also classified as a F006 waste pile because it was derived from a listed waste. An F006 waste is comprised of wastewater treatment sludges from certain kinds of electroplating operations. Millco placed most of the waste pile of aggregate into five covered or partially covered roll-offs located on-site in late 1988 or early 1989. Aggregate is still on the ground at the site. Brian Casey of Millco indicated that additional test results of the aggregate exhibited lead levels (71 ppm: probably total lead) above the detection limit. A circular berm of aggregate and soil remains at the site which has been emptied once of water that had accumulated in it. This water was pumped into a holding tank. The City of Columbus has given permission to dispose of it via discharge to their wastewater treatment system. During the last year, the circular berm has again accumulated water. This contaminated water will be pumped to the holding tank which still contains the water originally pumped out that has not yet been discharged. Because this water has yet to be tested, the holding tank to which it will be pumped was designated an Area of Concern.

Two Solid Waste Management Units (SWMUs) were tentatively identified based on the file review, the roll-offs and area surrounding the roll-offs including the circular berm of remaining soil and aggregate (see Table ES-1). Based on the VSI, the number of SWMUs did not change, but an Area of Concern, the holding tank, was identified.

TABLE ES-1

**MILLCO CONSTRUCTION COMPANY
CURRENT SOLID WASTE MANAGEMENT UNITS**

Solid Waste Management Unit	Operational Dates	Release History
*Waste Pile Area	Approximately October 1988 to Present	Continuous
*Roll-offs	Possibly Late 1988 or Early 1989	Unknown
Holding Tank	Possibly 1989 to Present	None

*Indicates SWMUs identified during the PR.

**PRELIMINARY REVIEW/VISUAL SITE INSPECTION (PR/VSI) REPORT
RCRA FACILITY ASSESSMENT (RFA)**

FACILITY NAME: **MILLCO CONSTRUCTION COMPANY
700 DEARBORN PARK LANE
WORTHINGTON, OHIO**

LATITUDE: 40° 07' 22"
LONGITUDE: 82° 58' 37"

SITE CONTACT: **ROBERT MILLER**
PHONE: **(614) 761-2533**
EPA ID #: **OHD 986971422**

1.0 INTRODUCTION

This section of the RCRA Facility Assessment (RFA) report covers the purpose and scope of the RFA process. It also describes the other sections of this report.

1.1 Background

This report was prepared by Metcalf & Eddy, Inc. under the Technical Enforcement Support (TES) X Contract, at the request of the United States Environmental Protection Agency (U.S. EPA), Region V. It describes the Preliminary Review (PR) of the file material for the Millco Construction Company (Millco) and the Visual Site Inspection (VSI) of the facility. These are the first two steps in conducting a Resource Conservation & Recovery Act (RCRA) Facility Assessment (RFA). The RFA is the first phase of the RCRA corrective action program and consists of a PR, VSI and, if appropriate, a sampling visit (SV). The report summarizes available information about the site and will assist the U.S. EPA in recommending further steps in the corrective action process.

The 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) provide new authorities for the U.S. Environmental Protection Agency (EPA) to compel owners and operators of hazardous waste treatment, storage and disposal facilities to take corrective actions for releases of hazardous wastes and hazardous constituents. These authorities apply to releases at facilities subject to the permitting requirements of RCRA Section 3005(e) and at facilities applying for RCRA permits. These amendments require EPA to address the need for corrective action for previously unregulated releases to air, surface water, soil, and ground

water, and to address the generation of subsurface gas. Section 3004(u) of RCRA allows EPA to require corrective actions after permit issuance through a schedule of compliance. Section 3008(h) allows EPA to require corrective actions to an enforcement action.

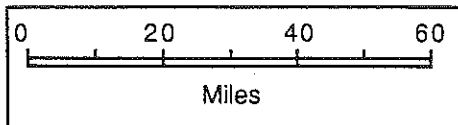
This report summarizes file information related to releases of Hazardous waste at the Millco Construction Company facility located in Franklin County, Ohio (see Figure 1). Releases into all media are considered, including ground water, air, surface water and soils, and subsurface gas releases. All areas of potential release are considered, but the focus is on SWMUs.

A Solid Waste Management Unit (SWMU) is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators and underground injection wells.
- Closed and abandoned units.
- Recycling units, wastewater treatment units and other units that EPA has generally exempted from standards applicable to hazardous waste management units.
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas.

An Area of Concern (AOC) is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a non-routine or non-systematic basis. This includes any area where such a release in the future is judged to be a strong possibility. The list and description of the SWMUs and AOCs in the report may not be all inclusive. Furthermore, the fact that a SWMU was not identified in the report does not affect U.S. EPA's authority for corrective action for SWMUs which may not be contained in the report.



COUNTY LOCATION
MILLCO CONSTRUCTION COMPANY

Project Number
150043-0011-626

Figure 1

The central purpose of an RFA is to identify releases or potential releases requiring further investigation. According to EPA's RFA Guidance Document, the four purposes of an RFA are as follows:

1. To identify and gather information on releases at RCRA-regulated facilities.
2. To evaluate SWMUs and other AOCs for releases to all media and to evaluate regulated units for releases to media other than ground water.
3. To make preliminary determinations regarding releases of concern and the need for further actions and interim measures at the facility.
4. To screen from further investigations those SWMUs that do not pose a threat to human health and the environment.

The Millco Construction Company is a construction and real estate development company which specializes in warehouse and industrial development. The company's headquarters are located in Dublin in Franklin County, Ohio (Figure 1). In October 1988, Millco Development purchased aggregate to be used as a parking lot base at one of their construction sites (which is where Millco also houses their equipment), located at the corner of Sancus Boulevard and Dearborn Park Road in Worthington, Ohio. The aggregate was purchased from Inorganic Recycling and was found to contain high levels of hexavalent chromium (EP Toxicity of up to 85 ppm) (6).

M&E performed a review of Millco's files at the Ohio Environmental Protection Agency (OEPA) Central District Office located in Columbus, Ohio, and the U.S. EPA Region V RCRA files located in Chicago, Illinois. Two Solid Waste Management Units (SWMU) (See Table 1) were tentatively identified based on the review. M&E performed the VSI on August 16, 1990, to verify the existence of the SWMUs and to identify any other SWMUs or areas of concern. The M&E site inspection team consisted of Mary Beth Smrecansky (Chemist) and Lisa Allinger (Senior Environmental Scientist). The M&E team was accompanied by Jennifer Hille of the OEPA. Inspection personnel were met by Brian Casey, Vice President of Millco Construction Company and Doug Beechi, Millco Construction Company. Based on the VSI, the number of SWMUs did not change. An area of concern was noted during the VSI which entailed a holding tank for water pumped from the waste pile area. Also, additional test results were provided by Brian Casey which indicated the presence of lead (up to 71 ppm; whether total or EP Toxicity is unknown, but probably total lead).

TABLE 1
MILLCO CONSTRUCTION COMPANY
SOLID WASTE MANAGEMENT UNITS SUMMARY TABLE

Solid Waste Management Unit	Operational Dates	Release History
Waste Pile Area	Approximately October 1988 to Present	Continuous
Roll-offs	Possibly Late 1988 or Early 1989	Unknown
Holding Tank	Possibly 1989 to Present	None

1.2 Permit History

No Part A or Part B permits have been submitted for this facility. No air or NPDES permits are known to be required.

1.3 Enforcement History

Jennifer Hille of the Ohio Environmental Protection Agency (Ohio EPA) stated that prior to Inorganic Recycling selling the aggregate to Millco, Ohio EPA was questioning the potential hazardous content of the aggregate. Once it was discovered that the aggregate was purchased by Millco, it was sampled by OEPA and subjected to the EP Toxicity test and failed for chromium. Ohio EPA then also designated the stored aggregate as a F006 waste pile as a result of being derived from a listed hazardous waste. An F006 waste is comprised of wastewater treatment sludges from certain kinds of electroplating operations (12).

On July 6, 1989, Ohio EPA issued Findings and Orders to Millco regarding the disposal of hazardous waste in storage at the Millco facility and closure requirements for the areas where hazardous wastes are held (15). A Closure Plan for the Millco facility was submitted to Ohio EPA on March 14, 1990 (23) and was disapproved (25). A Notice of Deficiency for the Closure Plan was sent to Millco on June 15, 1990 (27). According to Jennifer Hille, Ohio EPA, Millco resubmitted a closure plan which has been approved and is currently to be cleaning up the site (29).

1.4 Project Description and Report Format

This RFA report consists of five sections and three appendices. The information contained in the report is designed to give the reader a thorough description of site-specific and area conditions at the facility, and to provide information on individual units at the site. The following sections of the report are outlined below.

Section 2.0 describes the facility and its operations by providing general facility information, process information, waste management practices, and regulatory status of SWMUs at the site.

Section 3.0 provides information on the general environmental setting in the immediate area and in the region where the facility is located. The climate, surface water, ground water, soils, geology and land use in the vicinity of the site are described in this section.

Section 4.0 presents unit-specific information on SWMUs. For each SWMU description, status, waste types) and management, evidence of releases, summary of remedial actions and suggested actions are provided.

Section 5.0 provides conclusions and recommendations, including a summary table for all SWMUs identified during the RFA.

Finally, the Appendices contain photographs taken during the visual site inspection, analytical data obtained, if available, and field notes.

2.0 GENERAL DESCRIPTION OF FACILITY AND PROCESSES

The Millco Construction Company is a construction and real estate development company specializing in warehouse and industrial development. Primary use of the Millco property is for the storage of construction equipment and materials.

2.1 Facility Location and Operation

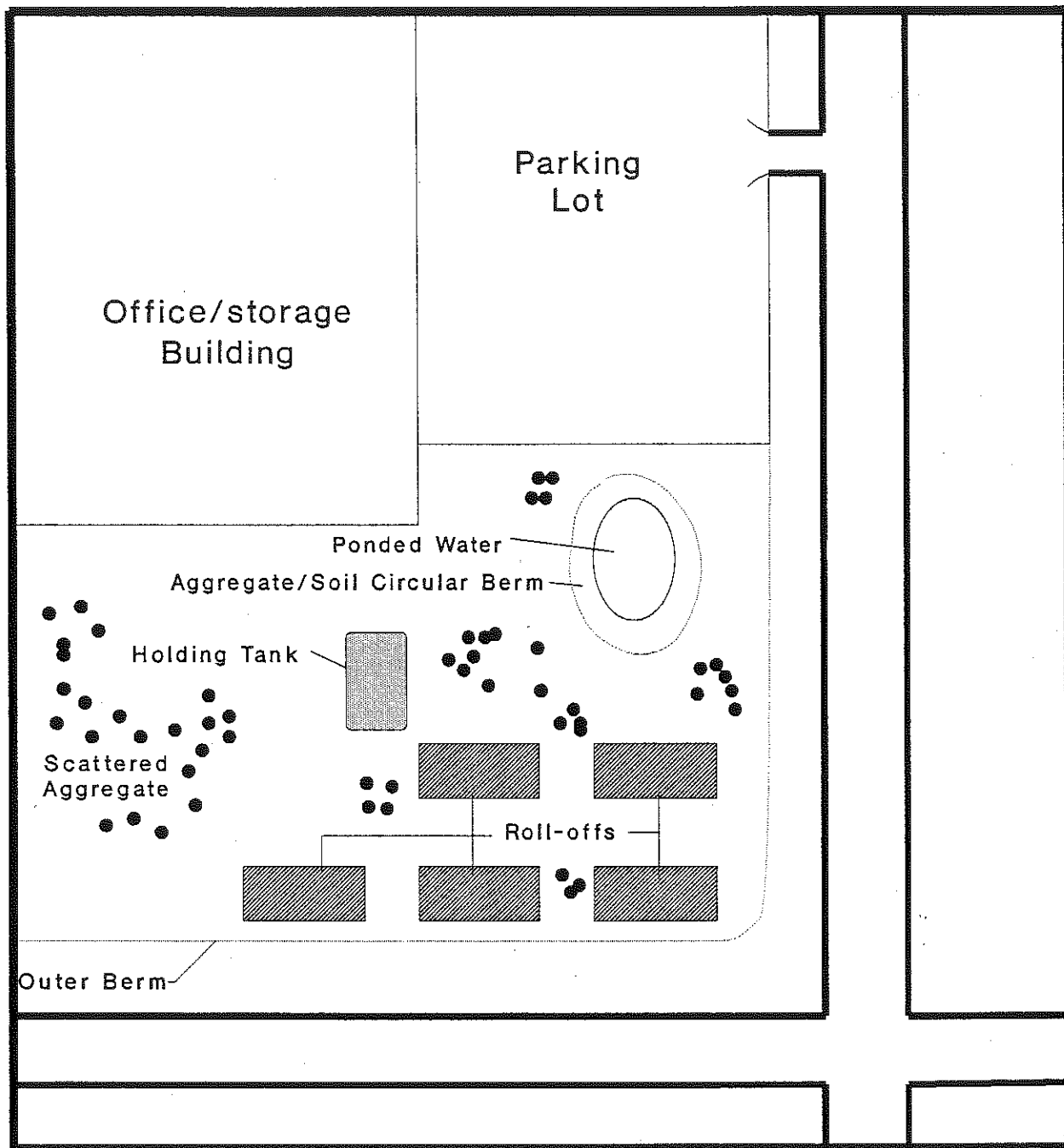
Millco's corporate offices are located at 437 Tuller Road in Dublin, Ohio. A subsidiary of Millco, Millco Development, purchased aggregate from Inorganic Recycling and had it delivered to their leasing address at 700 Dearborn Park Lane in Worthington, Ohio, which is at the southwest corner of Sancus Boulevard and Dearborn Park Lane, just west of 7469 Worthington-Galena Road (see Figure 2). This site is located across the street from Inorganic Recycling.

The Millco site is located in a primarily commercial/industrial zone, with a residential area located approximately one-quarter to one-half mile south of it. The area is relatively flat and there were no streams observed near the site. Worthington has a population of 15,016 (30).

The aggregate purchased by Millco from Inorganic Recycling was recycled from an F006 waste. The Ohio EPA collected samples of the waste pile at the Millco site. These samples contained high levels of hexavalent chromium (EP Toxicity of up to 85 ppm) (6). This aggregate was derived from a F006 waste, hence the stored material is also designated by Ohio EPA as a F006 waste pile. When the aggregate was brought onto the site, it was placed on the ground in piles on the north and northeastern portions of the site. After the aggregate was designated as a F006 waste, most of the aggregate was scraped into a pile, then placed into five roll-off containers on the east side of the property. Two of the roll-offs are completely covered with tarps. Two roll-offs are partially covered



North ↑



"Not to Scale"



SITE MAP
MILLCO CONSTRUCTION COMPANY
WORTHINGTON, OHIO

Project Number
152043-0011-626

Figure 3

and one roll-off has no cover and has trash, such as boards and paper, piled on top of it. A circular berm of mixed aggregate and soil remains where the pile was located (see Figure 3). Plastic was placed over the remains of the pile to keep water out. The plastic is now torn and water has accumulated inside the berm.

3.0 ENVIRONMENTAL SETTING

This section describes the environmental setting of the Millco facility, including a description of the geology, hydrogeology and climate/meteorology of the central Ohio area in which the facility is located.

3.1 Geology

The bedrock found in Franklin County is of marine sedimentary origin and consists primarily of dolomite, limestone, shale and sandstone (28). The facility area was glaciated extensively during the Pleistocene. Although there is no site specific data available, it is likely that the surficial geology is a result of this glaciation. These glacial deposits are composed primarily of a slightly weathered, yellow to buff brown glacial till (28).

3.2 Hydrogeology

There was no information on hydrogeology at the site in any U.S. EPA or Ohio EPA files. No known wells are located in the area. At the time of the VSI, no known research had been conducted at the site.

3.3 Climate

The climate and meteorology is typical of central Ohio. Precise meteorological data were not obtained, but rainfall maps prepared by the Soil Conservation Survey in Ohio indicate that the average annual rainfall is approximately 38.12 inches and the average temperature is 51.8° F in central Ohio. The prominent wind direction is from the south-southwest.

3.4 Pollutant Releases Into Ground Water

There has been no monitoring or sampling of ground water at the Millco Construction Company facility, although the aquifer is estimated to 10 to 15 feet below the ground surface. The potential for

the movement of chromium and lead contaminants into the ground water exists if the ground water table of the aquifer or a perched water table intercepts the contaminated soil. Contamination migration resulting from dissolved analytes percolating through the unsaturated zone during storm events is also feasible.

3.4.1 Release Potential

The potential for contaminant release into the ground water exists through contact with the water table or percolation of dissolved analytes through the unsaturated zone from the contaminated soil.

3.4.2 Monitoring Data

The facility personnel are not aware of any ground water sampling performed at the site.

3.4.3 Potential Receptors

According the Jennifer Hille, Ohio EPA, the City of Columbus Water System is a source of drinking water for the area. The portion of the City of Columbus Water System that services this area is a surface water system. No known wells are located in the area. The potential also exists for contaminated ground water to affect surface water quality within a local or regional discharge area. Potential receptors are any people, animals or biota living in or using the water.

3.5 Pollutant Releases Into Surface Water

Analysis of the extract from the waste pile of aggregate has shown high levels of chromium (up to 85 mg/l) (6), and the aggregate has also exhibited lead (71 ppm; whether total lead or EP Toxicity is unknown per Brian Casey of Millco, but probably total lead). The aggregate site is located in a vacant lot. After the majority of the waste pile was removed and placed into roll-offs, a portion of the excavation (a circular berm of aggregate and soil) was left uncovered, allowing surface water to accumulate within the berm. Facility personnel said this water was transferred to the holding tank which is presently on-site. The excavated area is now covered with plastic sheeting to help prevent the accumulation of surface water. However, the plastic sheeting is torn, and consequently water has again accumulated in the excavation.

3.5.1 Release Potential

Although there were no bodies of water observed in the area during the VSI (except for the water that has collected in the circular berm), there is a potential for release from normal area surface runoff.

3.5.2 Monitoring Data

According to Jennifer Hille of OEPA, an analysis was conducted on samples from the aforementioned holding tank, which contains surface water pumped from the excavation. During the VSI, Jennifer Hille OEPA stated that the hexavalent chromium levels from the holding tank were low enough to allow disposal of the material via discharge to the City of Columbus wastewater treatment plant. No data is available for the surface water now contained in the excavation.

3.5.3 Potential Receptors

Potential receptors of the surface water are the ground water users, if any, should there be any direct hydrological connection of the surface and ground water. In addition, any humans, animals or biota living in or using the water would be a potential receptor.

3.6 Pollutant Releases Into Air

Most of the chromium and lead contaminated aggregate has been placed in five roll-off containers and, with the exception of one roll-off, has been covered or partially covered. Therefore, the release potential for fugitive emissions is minimal (17). The roll-off container which is not covered has also been used as a trash container. This trash/debris covering also serves to minimize emissions from the aggregate.

3.6.1 Release Potential

The release potential of fugitive emissions of hexavalent chromium and lead from the residuals waste pile is minimal because the material is covered or partially covered. If this material would become airborne, receptors would be those people or animals which could inhale the material.

3.6.2 Monitoring Data

The facility personnel are not aware of any air monitoring data collection being performed at this site.

3.6.3 Potential Receptors

Although no data support the existence of gaseous pollutants, if they exist they could migrate to the surface and contaminate the air. This would potentially affect any people, mammals and biota living within the immediate area.

3.7 Pollutant Releases Into Soil

The chromium and lead contaminated aggregate was purchased and transported to the site in October 1988. Therefore, the aggregate material sat on the native soil for approximately 1.5 years before being identified as hazardous and collected and stored in the roll-off containers. In addition, 145 cubic yards of material were purchased and only approximately 100 cubic yards are stored in roll-offs. Therefore, some of the contaminated aggregate is still exposed on the surface at the site.

3.7.1 Release Potential

The aggregate material was first stored in six separate piles. The piles were then combined into one large pile and covered with plastic (conversation with Jennifer Hille of Ohio EPA, during VSI on August 16, 1990). Most of the one large pile was excavated and the material was stored in roll-off containers. When the material was excavated, a circular berm was built around the excavated depression to capture runoff. The berm area still contains an uncovered percentage of the hazardous material. Therefore, due to the exposure and movement of the aggregate material over time (e.g., leaching, runoff), there is potential for release of contamination into the soil is possible.

3.7.2 Monitoring Data

EP Toxicity analyses of aggregate/soil samples conducted in October 1988 indicated concentrations of up to 85 ppm of chromium (6). In addition, soil sampling was conducted on August 3, 1990 at the request of Millco's banking institution. These samples were analyzed for chromium and lead. Both analytes were found above farm soil ranges. Chromium levels were above background (not provided or available in records) and lead levels were 71 ppm (whether total or EP Toxicity is unknown, but

analyses were probably total chromium and lead). This information was provided by Brian Casey of Millco during the VSI.

3.7.3 Potential Receptors

Potential receptors on-site are any biota, ground water (e.g., via migration of contamination from dissolved analytes percolating through unsaturated zones during storm events) or surface water which has come in contact with the contaminated soil. The site is not fenced, thus the contaminated area is accessible to the public.

3.8 Releases of Gaseous Pollutants Into Subsurface Soil

Although there is no available information, gaseous pollutants would not be expected to be a problem because inorganic metals tend not to occur in the gaseous phase under normal conditions.

3.8.1 Release Potential

The release potential of gaseous pollutants from the chromium and lead contaminated soil to the air is minimal since inorganic metals tend not to occur in a gaseous phase. There is no potential for release of organics to the air, providing that no organics are present.

3.8.2 Monitoring Data

No gas monitoring has been conducted.

3.8.3 Potential Receptors

Although there has been no data to support the existence of gaseous pollutants, if they exist they could migrate to the surface and contaminate the ambient air.

4.0 DESCRIPTION OF SOLID WASTE MANAGEMENT UNITS (SWMUs)

This section contains file review information supplemented by results of the VSI and telephone conversations with facility representatives.

4.1 Unit Type: Waste Pile Area

Regulatory Status: SWMU. Inactive aggregate area. This area is shown on Figure 3.

- A. Unit Description: The waste pile area consists of aggregate purchased from Inorganic Recycling for use as a parking lot base (1). The material was originally stored as six piles in the area designated for a parking lot to be constructed at the northern and eastern portion of the land adjacent to the existing building on the site (and east of the existing parking lot). Much of the material was later placed in five roll-offs located on-site of the designated parking lot. Millco left a circular berm of this material to reduce runoff (see Photograph 1, Appendix A). Residuals of the material still remain in the area that was scraped up to collect the material for storage in the roll-off containers (see Photograph 2, Appendix A). Water accumulated in the remaining aggregate berm. It was pumped into an adjacent 5,000 gallon holding tank (refer to 4.3 for further explanation of this Area of Concern). The area within the circular berm of remaining hazardous aggregate and soil was covered with plastic. However, the plastic is torn in several locations and water has again accumulated (Photograph 3, Appendix A).
- B. Age: 2 years.
Period of Operation: The waste pile aggregate was purchased from Inorganic Recycling in October 1988.
- C. Waste Type: Aggregate "recycled" from a F006 hazardous waste.

Waste Volume/Capacity: Approximately 145 cubic yards were purchased. However, each of the five roll-offs hold only 20 cubic yards. Aggregate is still scattered over one acre and a circular berm of this aggregate and soil mixture remains.

Waste Constituents: The waste contains high concentrations of hexavalent chromium (EP Toxicity of up to 85 ppm) (6) and lead (71 ppm; whether total or EP Toxicity is unknown, but probably total lead) (Brian Casey of Millco).
- D. Release Controls: The circular berm contains a mixture of aggregate in addition to the surrounding soil. There are cracks in the berm which contain water and the plastic covering the circular berm is torn which has resulted in additional water accumulation.

E. Release History: The aggregate material has been exposed since its placement on-site.

F. Potential Human and Environmental Receptors:

Soil/Groundwater: The soil is already contaminated with chromium and lead. Aggregate can still be found on the ground in and around the circular berm and under the roll-offs. The level of the water table or presence of an existing aquifer are unknown. Because it is unknown, there is potential for release of contaminants to the ground water.

Surface Water: The impounded water may be contaminated from the aggregate/soil mixture because some of the water may have been contained there for over one year. No other surface water was noted immediately within the vicinity of the waste pile area. Storm sewers may possibly be located in the parking lot adjacent to the berm, but none were located.

Air: There is minimal potential for release to air.

Subsurface Gas: There is minimal potential for release of subsurface gas.

G. VSI Observations: Aggregate was scattered across the surface of the soils within the perimeter of the waste pile area located on the north and northeastern portion of the site, which is just north and east of the building located on-site. The circular berm wall of material has cracks on the outside (Photograph 4, Appendix A). The condition of the inside wall of the berm was concealed. Water has collected inside the berm, as seen through the top of the torn plastic in Photograph 3, Appendix A.

H. Sample Results: Additional sample results obtained at the request of the bank affiliated with Millco were shown to OEPA and M&E personnel during the VSI. However, according to Brian Casey of Millco, the bank personnel did not want copies distributed. These results not only provided additional evidence of chromium contamination (confirmed above background levels), but lead contamination was also determined, according to Brian Casey of Millco (71 ppm; whether total or EP Toxicity is unknown, but probably total lead).

4.2 Unit Type: Roll-offs

Regulatory Status: SWMU. See Figure 3 for location of the roll-offs. Photographs 5 and 6 in Appendix A provides a visual description of these containers.

A. Unit Description: There are five roll-offs located within the waste pile area. Each has a capacity of 20 cubic yards (approximately 145 cubic yards of F006 material was purchased). Two of the roll-offs are completely covered and two are partially covered with a tarp. One of the roll-offs has trash piled on top of the aggregate and has no cover. OEPA has told Millco several times to put a cover on the unit. At least one of the roll-offs is very rusty. The hazardous labels are either missing or faded on some of the roll-offs. Aggregate material is scattered all around them.

B. Age: Possibly 1 1/2 years.

Period of Operation: Possibly late 1988 or early 1989, until present.

C. Waste Type: Aggregate "recycled" from a F006 hazardous waste.

Waste Volume/Capacity: The material is contained in five roll-offs, each with a capacity of 20 cubic yards.

Waste Constituents: The aggregate waste contains high concentrations of hexavalent chromium (EP Toxicity of up to 85 ppm) (6) and lead (71 ppm; whether total or EP Toxicity is unknown, but probably total lead) (Brian Casey of Millco). One roll-off also has trash piled on top of the aggregate.

D. Release Controls: Only two of the roll-offs are completely covered with tarps. Two roll-offs are only partially covered with tarps and one roll-off is totally uncovered, but has trash on top of it. One roll-off is particularly worn and rusty.

E. Release History: Unknown. There is a potential that dust could be blown into the air from uncovered or partially exposed roll-offs. A hard rain could cause overflow of material onto the ground.

F. Potential Human and Environmental Receptors:

Soil/Groundwater: There should be no additional threat to the soil or ground water from the material in the containers unless rain would wash uncovered material onto the ground on which the roll-offs are standing. The ground beneath the roll-offs already has aggregate spread throughout.

Surface Water: There is minimal potential for release to surface water because there is no known body of water nearby (except the water contained within the circular berm of aggregate and soil). If material would escape it could be transported by tracking or runoff to surface water if located close by.

Air: There is some potential of release to the air from uncovered material in the roll-offs.

Subsurface Gas: There is minimal potential for release of subsurface gas.

- G. VSI Observations: Only two of the roll-offs were completely covered with tarps. One was uncovered and filled with trash. One roll-off in particular looked very worn and rusty. Aggregate was scattered around the base and between the roll-offs.
- H. Sample Results: No additional sample results were provided by facility personnel.

4.3 Unit Type: Holding Tank

Regulatory Status: Area of Concern. See Figure 2 for location of the holding tank. The holding tank is shown in Photograph 6, Appendix A.

- A. Unit Description: A 5,000 gallon holding tank is being used to store water which accumulated in the circular bermed area that remained after most of the aggregate material was removed (Photograph 7, Appendix A). The tank sits adjacent both the circular berm and the roll-offs.
- B. Age: Possibly 1 year.
Period of Operation: About 1989 to present.
- C. Waste Type: The holding tank contains the water that was removed from within the circular berm of aggregate and soil (about mid-1989) (conversation with Jennifer Hille of Ohio EPA, during VSI on August 16, 1990).

Waste Volume/Capacity: The tank has a holding capacity of 5,000 gallons. Brian Casey of Millco stated that the water removed from the bermed area filled about half of the 5,000 gallon tank.

Waste Constituents: Jennifer Hille stated that the water was tested for removal about mid-1989. Jennifer Hille also stated the City of Columbus had said it would be acceptable at the wastewater treatment plant. However, more water has accumulated within the circular berm of aggregate and soil since the initial accumulation of water was removed and this water has been standing there for a period of time.

D. **Release Controls:** The tank is not capped. There is no secondary containment.

E. **Release History:** None.

F. **Potential Human and Environmental Receptors:**

Soil/Groundwater: There is minimal potential threat to soil or ground water because the water presently contained within the holding tank is not considered hazardous according to City test results, and the tank appears to be in good condition. (Conversation with Jennifer Hille of Ohio EPA, during VSI on August 16, 1990).

Surface Water: There is minimal potential for release of contaminants to surface water.

Air: There is minimal potential release of contaminants to the air.

Subsurface Gas: There is minimal potential for release of subsurface gas.

G. **VSI Observations:** The tank appears to be in good condition. There is no evidence of any releases.

H. **Sample Results:** Sample results for this unit were not available from facility personnel.

5.0 SUMMARY AND RECOMMENDATIONS

The principal environmental concerns at the Millco Construction Company's waste pile site are the soil contamination and potential ground water and surface water contamination associated with the aggregate waste pile. Listed below are the recommended sampling points, parameters for analysis and other actions necessary to complete the unit investigation.

1. Waste Pile Area - Although soil sampling has indicated chromium contamination (6) in the undeveloped parking area on the north and northeastern part of the site, additional sampling at the request of Millco's bank resulted in discovering lead contamination (according to Brian Casey during VSI on August 16, 1990). Therefore, additional soil samples should be collected at certain points to determine the boundaries, types and degree of contamination. In addition, several samples should be collected in the waste pile area, including the "pit" and outside the circular berm of the pit and around the dumpsters (the aggregate material was there before the dumpsters). These samples should be collected at various depths to confirm whether any migration has occurred. At a minimum, analytical parameters should include chromium and lead and it may be further necessary to test for all compounds listed on the RCRA Appendix IX List.
3. Roll-Offs - Recommend soil and ground water sampling as described in Number 1 above, around and beneath the roll-offs once they are removed. At a minimum, analytical parameters should include chromium and lead and it may be further necessary to test for all compounds listed on the RCRA Appendix IX List. Concentrations of chromium and lead have been confirmed.
3. Holding Tank - The water already contained within the holding tank was sampled and considered acceptable for the City of Columbus' wastewater treatment plant. However, additional water that has accumulated within the walls of the circular berm since the "pit" was pumped out (mid-1989) may have become contaminated from standing in a contaminated confinement. The surface water remaining within the bermed area should be sampled before it is pumped into the holding tank. This sampling might preclude the possibility of contaminating the water in the holding tank with possibly higher concentrations of hazardous constituents. If the accumulated surface water is pumped into the holding tank before it is sampled, the water in the holding tank should be analyzed again before it is disposed off-site. At a minimum, analytical parameters should include chromium and lead and it may be further necessary to test for all compounds listed on the RCRA Appendix IX List.

Table 2 lists all SWMUs, operational dates, release history and suggested further actions.

TABLE 2

**MILLCO CONSTRUCTION COMPANY
CURRENT SOLID WASTE MANAGEMENT UNITS**

Solid Waste Management Unit	Operational Dates	Release History	Suggested Further Action
Waste Pile Area	Approximately October	Continuous 1988 to Present	Soil sampling and several samples at 3, 5 and 10 feet to confirm if migration has occurred.
Roll-offs	Possibly Late 1988 or Early 1989	Unknown	Soil sampling and several samples at 3, 5 and 10 feet to confirm if migration has occurred.
Holding Tank	Possibly 1989 to Present	None	Surface water sampling of water in bermed waste pile area (prior to addition to tank), or once when remaining water accumulated in waste pile area is added to tank.

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APPENDIX A

VISUAL SITE INSPECTION PHOTO LOG

APPENDIX B

COPY OF LOG BOOK USED DURING VSI

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EXECUTIVE SUMMARY

As a part of the PR/VSI conducted at the request of U.S. EPA, Metcalf & Eddy conducted a preliminary review of federal and state file material for the Millico Construction Company facility (OHD986971422) and conducted a visual site inspection of the facility in order to summarize available information concerning the site and to assist the U.S. EPA in recommending further steps in the corrective action process. The Millico Construction Company is located at 700 Dearborn Park Lane in Worthington, Ohio. The facility is a construction and real estate development company specializing in warehouse and industrial development. Primary use of the property is for the storage of construction equipment and materials.

No test due to source material in October, 1988
Millico unknowingly purchased aggregate from Inorganic Recycling which was suspected to be contaminated with hazardous waste. The aggregate tested EP Toxicity for chromium and was designated as a F006 waste pile as a result. Millico placed most of the aggregate into five covered or partially covered roll-offs located on-site. Aggregate is still on the ground at the site. Additional test results of the aggregate exhibited lead levels above the detection limit. A circular berm of aggregate and soil remains at the site which has been emptied once of water that had accumulated in it. This water was pumped into a holding tank. The City of Columbus has given permission to dispose of it via discharge to their wastewater treatment system. During the last year, the circular berm has again accumulated water. This contaminated water will be pumped to the holding tank which still contains the water originally pumped out that has not yet been discharged. Because this water has yet to be tested, the holding tank to which it will be pumped was designated an Area of Concern.

Two Solid Waste Management Units (SWMUs), the roll-offs and area surrounding the roll-offs including the circular berm of remaining soil and aggregate, were tentatively identified based on the file reviews (see Table ES-1). Based on the VSI, the number of SWMUs did not change, but an Area of Concern, the holding tank, was identified.

TABLE ES-1
MILLCO CONSTRUCTION COMPANY
CURRENT SOLID WASTE MANAGEMENT UNITS

Solid Waste Management Unit	Operational Dates	Release History
*Waste Pile Area	Approximately October 1988 to Present	Continuous
*Roll-offs	Possibly Late 1988 or Early 1989	Unknown
Holding Tank	Possibly 1989 to Present	None

*Indicates SWMUs identified during the PR.

PRELIMINARY REVIEW/VISUAL SITE INSPECTION (PR/VS) REPORT
RCRA FACILITY ASSESSMENT (RFA)

FACILITY NAME: MILLCO CONSTRUCTION COMPANY
700 DEARBORN PARK LANE
WORTHINGTON, OHIO
LATITUDE 40° 07' 22"
LONGITUDE 82° 58' 37"

*zipcode?
Worthington
Dublin?*

SITE CONTACT: ROBERT MILLER
PHONE: (614) 761-2533
EPA ID #: OHD 986971422

1.0 INTRODUCTION

This report was prepared by Metcalf & Eddy, Inc. under the Technical Enforcement Support (TES) X Contract at the request of the United States Environmental Protection Agency (U.S. EPA) Region V. It describes the Preliminary Review (PR) of the file material for the Millco Construction Company (Millco) and the Visual Site Inspection (VSI) of the facility. These are the first two steps in conducting a Resource Conservation & Recovery Act (RCRA) Facility Assessment (RFA). The format of this document is in accord with U.S. EPA guidance on conducting and documenting an RFA. The purpose of this report is to summarize available information about the site and to assist the U.S. EPA in recommending further steps in the corrective action process.

The Millco Construction Company is a construction and real estate development company which specializes in warehouse and industrial development. The company's headquarters are located in Dublin in Franklin County, Ohio (Figure 1). In October 1988, Millco Development purchased aggregate to be used as a parking lot base at one of their construction sites (which is where Millco also houses their equipment) located at the corner of Sancus Boulevard and Dearborn Park Road in Worthington, Ohio. The aggregate was purchased from Inorganic Recycling and contained high levels of hexavalent chromium (EP Toxicity of up to 85 ppm) (6).

M&E performed a review of Millco's files at the Ohio Environmental Protection Agency (OEPA) Central District Office located in Columbus, Ohio, and the U.S. EPA Region V RCRA files located in Chicago, Illinois. Two Solid Waste Management Units (SWMU) (See Table 1) were tentatively identified based on the review. M&E performed the VSI on August 16, 1990, to verify the existence

Figure 1. County Location Map



Franklin
County

Not to Scale

TABLE 1

MILLCO CONSTRUCTION COMPANY
SUMMARY OF SOLID WASTE MANAGEMENT UNITS

Unit Name	Regulatory Status Before USI	After VSI
Waste Pile Area	SWMU	SWMU
Roll-offs	SWMU	SWMU
Holding Tank	Unknown	Area of Concern

of the SWMUs and to identify any other SWMUs or areas of concern. The M&E site inspection team consisted of Mary Beth Smrecansky (Chemist) and Lisa Allinger (Senior Environmental Scientist). The M&E team was accompanied by Jennifer Hille of the OEPA. Inspection personnel were met by Brian Casey, Vice President of Milco Construction Company and Doug Beechi, Milco Construction Company. Based on the VSI, the number of SWMUs did not change. An area of concern was noted during the VSI which entailed a holding tank for water pumped from the waste pile area. Also, additional test results were provided by Brian Casey which indicated the presence of lead (up to 71 ppm whether total or EP Toxicity is unknown).

This report summarizes information related to releases of hazardous waste at the Milco facility. Releases into all media are considered, including air, soils, surface water, ground water and subsurface gases. All areas of potential releases are considered with the focus on Solid Waste Management Units (SWMUs). SWMUs are defined as any discernible waste management unit at a RCRA facility from which hazardous constituents might migrate. *defer*

Section 2.0 of this report provides an overall facility description. Facility operations, environmental characteristics, and potential releases are described from a facility-wide perspective. Detailed discussions of each SWMU are provided in Section 3.0. Section 4.0 summarizes the information given in Sections 2.0 and 3.0 and provides recommendations regarding a sampling visit, interim measures, or no further actions at the facility. A listing of documents reviewed in preparing this report is provided in the Bibliography. All documents in the Bibliography were reviewed in preparing this report, but not all contained information that needed to be cited as references in this report.

1.1 Permit History

No Part A or Part B permits have been submitted for this facility. No air or NPDES permits are known to be required.

1.2 Enforcement History

Jennifer Hille of the Ohio Environmental Protection Agency (Ohio EPA) stated that prior to Inorganic Recycling selling the aggregate to Milco, Ohio EPA was questioning the potential hazardous content of the aggregate. Once it was discovered that the aggregate was purchased by Milco, it was EP Toxicity tested for chromium. Ohio EPA designated the aggregate as a F006 waste pile as a result of the test (12).

*being denied
from a listed
hazardous
waste*

*tested by whom?
analyzed?*

F006 is

On July 6, 1989, Ohio EPA issued Findings and Orders to Millco regarding the disposal of hazardous waste in storage at the Millco facility and closure requirements for the areas where hazardous wastes are held (15). A Closure Plan for the Millco facility was submitted to Ohio EPA on March 14, 1990 (23) and was disapproved (25). A Notice of Deficiency for the Closure Plan was sent to Millco on June 15, 1990 (27). According to Jennifer Hille, Ohio EPA, Millco resubmitted a closure plan which has been approved and is currently to be cleaning up the site (29).

2.0 GENERAL DESCRIPTION OF FACILITY AND PROCESSES

The Millco Construction Company is a construction and real estate development company specializing in warehouse and industrial development. Primary use of the property is for the storage of construction equipment and materials.

2.1 Facility Location and Operation

Millco's corporate offices are located at 437 Tuller Road in Dublin, Ohio. A subsidiary of Millco, Millco Development, purchased aggregate from Inorganic Recycling and had it delivered to their address at 700 Dearborn Park Lane in Worthington, Ohio, which has a population of 15,016 (30). This site is located across the street from Inorganic Recycling.

The site is located in a primarily commercial/industrial zone with a residential area located approximately one-quarter to one-half mile south of it. The area is relatively flat and there were no streams observed near the site.

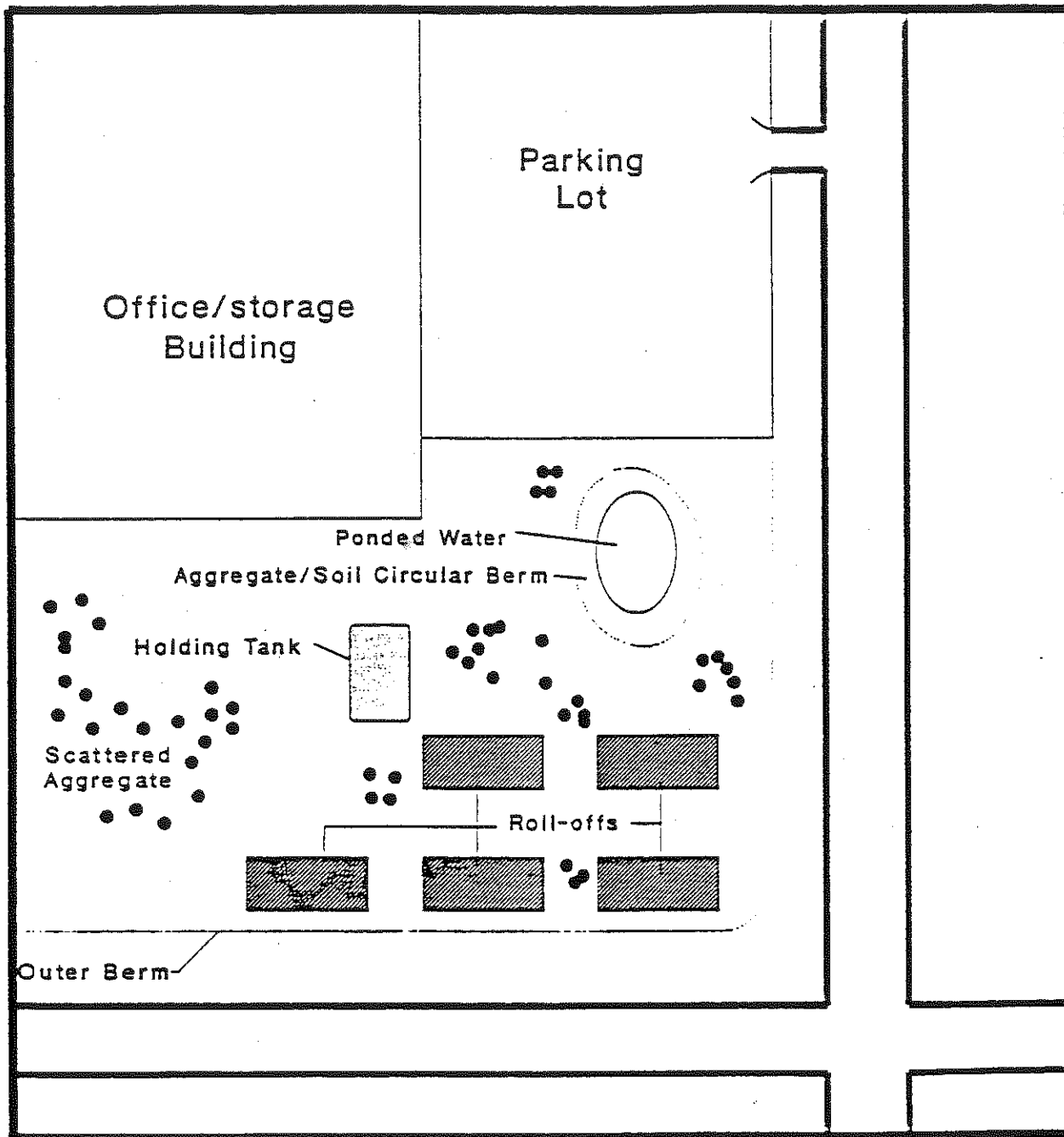
The aggregate purchased by Millco from Inorganic Recycling was recycled from an F006 waste. The Ohio EPA collected samples of the waste pile at the Millco site. These samples contained high levels of hexavalent chromium (EP Toxicity of up to 85 ppm) (6). This aggregate was then designated by Ohio EPA as a F006 waste pile. Most of the aggregate was scraped into a pile, then placed into five roll-off containers. Two of the roll-offs are completely covered with tarps. Two roll-offs are partially covered and one roll-off has no cover and has trash, such as boards and paper, piled on top of it. A circular berm of mixed aggregate and soil remains where the pile was located (see Figure 2). Plastic was placed over the remains of the pile to keep water out. The plastic is now torn and water has accumulated inside the berm.

When the aggregate was brought onto the site, it was placed on the ground in piles on the position of the site.

derived from a F006 waste, hence it is 0150

then

where



Not to Scale



SITE MAP
MILCO CONSTRUCTION COMPANY

Project Number
150043-0011-625

Figure 2

2.2 Environmental Setting

This section describes the environmental setting of the Millco facility including a description of the geology, hydrogeology and climate/meteorology of the central Ohio area in which the facility is located.

2.2.1 Geology

The bedrock found in Franklin County is of marine sedimentary origin and consists primarily of dolomite, limestone, shale and sandstone (28). The facility area was glaciated extensively during the Pleistocene. Although there is no site specific data available, it is likely that the surficial geology is a result of this glaciation. These glacial deposits are composed primarily of a slightly weathered, yellow to buff brown glacial till (28).

2.2.2 Hydrogeology

There was no information on hydrogeology at the site in any U.S. EPA or Ohio EPA files. No known wells are located in the area.

*(Any other research conducted?)
OEPA probably has this.
both surface + ground water*

2.2.3 Climate

The climate and meteorology is typical of central Ohio. Precise meteorological data were not obtained, but rainfall maps prepared by the Soil Conservation Survey in Ohio indicate that the average annual rainfall is approximately 38.12 inches and the average temperature is 51.8° F. The prominent wind direction is from the south-southwest.

in central Ohio?

2.3 Pollutant Releases Into Ground Water

There has been no monitoring or sampling of ground water at the Millco Construction Company facility. Although it is unlikely, the potential for the movement of chromium and lead contaminants into the ground water exists if the ground water table aquifer or a perched water table intercepts the contaminated soil. Contamination migration resulting from dissolved analytes percolating through the unsaturated zone during storm events is also feasible.

2.3.1 Release Potential

The potential for contaminant release into the ground water exists through contact with the water table or percolation of dissolved analytes through the unsaturated zone from the contaminated soil.

2.3.2 Monitoring Data

The facility personnel are not aware of any ground water sampling performed at the site.

2.3.3 Potential Receptors

According the Jennifer Hille, Ohio EPA, the City of Columbus Water System is a source of drinking water for the area. No known wells are located in the area. The potential also exists for contaminated ground water to affect surface water quality within a local or regional discharge area. Potential receptors ^{are} would be any people, animals or biota living in or using the water.

2.4 Pollutant Releases Into Surface Water

The waste pile of aggregate has high levels of chromium (up to 85 mg/l) (6) and lead (71 ppm, whether total lead or EP Toxicity is unknown, according to Brian Casey of Millco) and is located in a vacant lot. After the majority of the waste pile was removed and placed into roll-offs, a portion of the excavation (a circular berm of aggregate and soil) was left uncovered, allowing surface water to accumulate within the berm. Facility personnel said this water was transferred to the holding tank which is presently on-site. The excavated area is now covered with plastic sheeting to help prevent the accumulation of surface water. However, the plastic sheeting is torn, and consequently water has again accumulated in the excavation.

2.4.1 Release Potential

Although there were no bodies of water observed in the area during the VSI (except for the water that has collected in the circular berm), there is a potential for release from normal area surface runoff.

The portion of the City of Columbus Water System that services this area is a surface water system.

is the a ground water or surface water system?

2.4.2 Monitoring Data

An analysis was conducted on samples from the aforementioned holding tank, which contains surface water pumped from the excavation. During the VSL, Jennifer Hille of OEPA stated that the hexavalent chromium levels from the holding tank were low enough to allow disposal of the material via discharge to the City of Columbus wastewater treatment plant. No data is available for the surface water now contained in the excavation.

2.4.3 Potential Receptors

Potential receptors to the surface water ~~would be~~ the ground water, due to direct hydrological connection and any humans, animals or biota living in or using the water.

do we know this?

are ?
of the surface + ground water. (In addition)

users any? are potential receptors

2.5 Pollutant Releases Into Air

Most of the chromium and lead contaminated aggregate has been placed in five roll-off containers and, with the exception of one roll-off, has been covered or partially covered. Therefore, the release potential for fugitive emissions is minimal (17). The roll-off container which is not covered has also been used as a trash container. This trash/debris covering also serves to minimize emissions from the aggregate.

2.5.1 Release Potential

The release potential of fugitive emissions of hexavalent chromium and lead from the waste pile is minimal because the material is covered or partially covered.

What about existing or residual aggregate left on site?

2.5.2 Monitoring Data

The facility personnel are not aware of any air monitoring data collection being performed at this site.

2.5.3 Potential Receptors

Although no data support the existence of gaseous pollutants, if they exist they could migrate to the surface and contaminate the air. This would potentially affect any people, mammals and biota living within the immediate area.

2.6 Pollutant Releases Into Soil

Good!
The chromium and lead contaminated aggregate was purchased and transported to the site in October 1988. ⁽²³⁾ Therefore, the aggregate material sat on the native soil for approximately 1.5 years before being identified as hazardous and collected and stored in the roll-off containers. In addition, 145 cubic yards of material were purchased and only approximately 100 cubic yards are stored in roll-offs. Therefore, some of the contaminated aggregate is still exposed on the surface at the site.

2.6.1 Release Potential

source of information?
The aggregate material was first stored in six separate piles. ^{When? where on site} The piles were then combined into one large pile and covered with plastic. Most of the one large pile was excavated and the material was stored in roll-off containers. When the material was excavated, a circular berm was built around the excavated depression to capture runoff. The berm area still contains an uncovered percentage of the hazardous material. Therefore, due to the exposure and movement of the aggregate material over time (e.g., leaching, runoff), the potential for release of contamination into the soil is possible. *source of info?*

2.6.2 Monitoring Data

EP Toxicity analyses of soil samples conducted in October 1988 indicated concentrations of up to 85 ppm of chromium (6). In addition, soil sampling and analysis were conducted on August 3, 1990. These samples were analyzed for total chromium and total lead. Both analytes were found above farm soil ranges. Chromium levels were above background (not provided or available in records) and lead levels were 71 ppm (whether total or EP Toxicity is unknown; provided by Brian Casey of Millco during the VSI).

2.6.3 Potential Receptors

g w - a receptor?
Potential receptors on-site ^{are} would be any biota, ground water or surface water ^{users for other media} which has come in contact with the contaminated soil. The site is not fenced, thus the contaminated area is accessible to the public.

2.7 Releases of Gaseous Pollutants Into Subsurface Soil

Although there is no available information, gaseous pollutants would not be expected to be a problem due to the nature of the contamination present.

*Explain a little metals
Inorganics tend not to
occur in the gaseous phase
in normal conditions*

2.7.1 Release Potential

The release potential of gaseous pollutants from the chromium and lead contaminated soil to the air is minimal. There is no potential for release of organics to the air, providing that no organics are present.

*since inorganic metals tend not
to occur in gaseous phase in air*

2.7.2 Monitoring Data

No gas monitoring has been conducted.

2.7.3 Potential Receptors

Although there has been no data to support the existence of gaseous pollutants, if they exist they could migrate to the surface and contaminate the ambient air.

3.0 DESCRIPTION OF SOLID WASTE MANAGEMENT UNITS (SWMUs)

This section contains file review information supplemented by results of the VSI and telephone conversations with facility representatives.

3.1 Unit Type: Waste Pile Area

Regulatory Status: SWMU. Inactive aggregate area. This area is shown on Figure 2.

- A. Unit Description: The waste pile area consists of aggregate purchased from Inorganic Recycling for use as a parking lot base (1). The material was originally stored as six piles in the area designated for a parking lot. Much of the material was placed in five roll-offs. Millco left a circular berm of this material to reduce runoff (see Photograph 1, Appendix A). Residuals of the material still remain in the area that was scraped up to collect the material for storage in the roll-off containers (see Photograph 2, Appendix A). Water accumulated in the remaining aggregate berm. It was pumped out into an adjacent 5,000 gallon holding tank

The only evidence of release to date is the inorganic metals from the aggregate

any other when?

have was the area?

(refer to 3.3 for further explanation of this Area of Concern). The area within the circular berm of remaining hazardous aggregate and soil was covered with plastic. However, the plastic is torn in several locations and water has again accumulated (Photograph 3, Appendix A).

B. Age: 2 years.

Period of Operation: The waste pile aggregate was purchased from Inorganic Recycling in October 1988.

C. Waste Type: Aggregate recycled from a F006 hazardous waste.

"recycled" [Recycling operation can be exempt, to I guess it is with guidelines]

Waste Volume/Capacity: Approximately 145 cubic yards were purchased. However, each of the five roll-offs hold only 20 cubic yards. Aggregate is still scattered over one acre and a circular berm of this aggregate and soil mixture remains.

Waste Constituents: The waste contains high concentrations of hexavalent chromium (EP Toxicity of up to 85 ppm) (6) and lead (71 ppm - whether total or EP Toxicity is unknown) (Brian Casey of Millco).

D. Release Controls: The circular berm contains a mixture of aggregate in addition to the surrounding soil. There also are cracks in the berm which contain water and the plastic covering the circular berm is torn which has resulted in additional water accumulation.

E. Release History: The aggregate material has been exposed since its placement on-site.

F. Conclusions:

Soil/Groundwater: The soil is already contaminated with chromium and lead. Aggregate can still be found on the ground in and around the circular berm and under the roll-offs. The level of the water table or presence of an existing aquifer are unknown. Because it is unknown, there is potential for release of contaminants to the ground water.

Should be some information available

Surface Water: The impounded water may be contaminated from the aggregate/soil mixture because some of the water may have been contained there for over one year. No other surface water was noted immediately within the vicinity of the waste pile area. Storm sewers may possibly be located in the parking lot adjacent to the berm but none were located.

Air: There is minimal potential for release to air.

Subsurface Gas: There is minimal potential for release of subsurface gas.

- G. VSI Observations: Aggregate was scattered across the surface of the soils within the perimeter of the waste pile area. The circular berm wall of material has cracks on the outside (Photograph 4, Appendix A). The condition of the inside wall of the berm was concealed. Water has collected inside the berm, as seen through the top of the torn plastic in Photograph 3, Appendix A.

- H. Sample Results: Additional sample results obtained at the request of the bank affiliated with Millco were shown to OEPA and M&E personnel during the VSI. However, according to Brian Casey of Millco, the bank personnel did not want copies distributed. These results not only provided additional evidence of chromium contamination (confirmed above background levels), but lead contamination (71 ppm - whether total or EP Toxicity is unknown) was also determined.

3.2 Unit Type: Roll-offs

Regulatory Status: SWMU. See Figure 2 for location of the roll-offs. Photographs 5 and 6 in Appendix A provides a visual description of these containers.

- A. Unit Description: There are five roll-offs located within the waste pile area. Each has a capacity of 20 cubic yards (approximately 145 cubic yards of F006 material was purchased). Two of the roll-offs are completely covered and two are partially covered with a tarp. One of the roll-offs has trash piled on top of the aggregate and has no cover. OEPA has told Millco several times to put a cover on the unit. At least one of the roll-offs is very rusty. The hazardous labels are either missing or faded on some of the roll-offs. Aggregate material is scattered all around them.

- B. Age: Possibly 1 1/2 years.
Period of Operation: Possibly late 1988 or early 1990 until present.

C. Waste Type: Aggregate recycled from a F006 hazardous waste.

Waste Volume/Capacity: The material is contained in five roll-offs, each with a capacity of 20 cubic yards.

Waste Constituents: The aggregate waste contains high concentrations of hexavalent chromium (EP Toxicity of up to 85 ppm) (6) and lead (71 ppm - whether total or EP Toxicity is unknown) (Brian Casey of Millico). One roll-off also has trash piled on top of the aggregate.

D. Release Controls: Only two of the roll-offs are completely covered with tarps. Two roll-offs are only partially covered with tarps and one roll-off is totally uncovered, but has trash on top of it. One roll-off is particularly worn and rusty.

E. Release History: Unknown. There is minimal potential that dust could be blown into the air from uncovered or partially exposed roll-offs. A hard rain could cause overflow of material onto the ground.

F. Conclusions:

Soil/Groundwater: There should be no additional threat to the soil or ground water from the material in the containers unless rain would wash uncovered material onto the ground on which the roll-offs are standing. The ground beneath the roll-offs already has aggregate spread throughout.

Surface Water: There is minimal potential for release to surface water because there is no known body of water nearby (except the water contained within the circular berm of aggregate and soil). If material would escape it could be transported by tracking or runoff to surface water if located close by.

Air: There is some potential of release to the air from uncovered material in the roll-offs.

Subsurface Gas: There is minimal potential for release of subsurface gas.

G. VSI Observations: Only two of the roll-offs were completely covered with tarps. One was uncovered and filled with trash. One roll-off in particular looked very worn and rusty. Aggregate was scattered around the base and between the roll-offs.

H. Sample Results: No additional sample results were provided by facility personnel.

3.3 Unit Type: Holding Tank

Regulatory Status: Area of Concern. See Figure 2 for location of the holding tank. The holding tank is shown in Photograph 6, Appendix A.

A. Unit Description: A 5,000 gallon holding tank is being used to store water which accumulated in the circular bermed area that remained after most of the aggregate material was removed (Photograph 7, Appendix A). The tank sits adjacent both the circular berm and the roll-offs.

B. Age: Possibly 1 year.
Period of Operation: About 1989 to present.

C. Waste Type: The holding tank contains the water that was removed from within the circular berm of aggregate and soil (about mid-1989).

Waste Volume/Capacity: The tank has a holding capacity of 5,000 gallons. Brian Casey of Millco stated that the water removed from the bermed area filled about half of the 5,000 gallon tank.

Waste Constituents: Jennifer Hille stated that the water was tested for removal about mid-1989. Jennifer Hille also stated the City of Columbus had said it would be acceptable at the wastewater treatment plant. However, more water has accumulated within the circular berm of aggregate and soil since the initial accumulation of water was removed and this water has been standing there for a period of time.

D. Release Controls: The tank is not capped. There is no secondary containment.

E. Release History: None.

F. Conclusions:

Soil/Groundwater: There is minimal potential threat to soil or ground water because the water presently contained within the holding tank is not considered hazardous and the tank appears to be in good condition.

Some of information?

how do we know this?

Surface Water: There is minimal potential for release of contaminants to surface water.

Air: There is minimal potential release of contaminants to the air.

Subsurface Gas: There is minimal potential for release of subsurface gas.

G. VSI Observations: The tank appears to be in good condition. There is no evidence of any releases.

H. Sample Results: Sample results for this unit were not available from facility personnel.

4.0 SUMMARY AND RECOMMENDATIONS

The principal environmental concerns at the Millco Construction Company's waste pile site is the soil contamination and potential ground water and surface water contamination associated with the aggregate waste pile. Listed below are the recommended sampling points, parameters for analysis and other actions necessary to complete the unit investigation.

- Source of information*
1. Waste Pile Area - Although soil sampling has indicated chromium contamination (6), additional sampling at the request of Millco's bank resulted in discovering lead contamination. Therefore, additional soil samples should be collected at certain points to determine the boundaries and types of contamination. In addition, several samples should be collected in the waste pile area, including the "pit" and outside the circular berm of the pit and around the dumpsters (the aggregate material was there before the dumpsters). These samples should be collected at ^{various} 3, 5 and 10 foot depths to confirm whether any migration has occurred. At a minimum, analytical parameters should include chromium and lead and it may be further necessary to test for all compounds listed on ~~U.S. EPA Contract Laboratory Program's Target Compound List~~. *RCHA Appendix 1X*

2. Roll-Offs - Recommended soil and ground water sampling as described in Number 1 above around and beneath the roll-offs once they are removed. At a minimum, analytical parameters should include chromium and lead and it may be further necessary to test for all compounds listed on ~~U.S. EPA Contract Laboratory Program's Target Compound List~~. Excess concentrations of chromium and lead have been confirmed. *RCHA Appendix 1X List*

3. Holding Tank - The water already contained within the holding tank was sampled and considered acceptable for the City of Columbus' wastewater treatment plant. However, additional water that has accumulated within the walls of the circular berm since the "pit" was pumped out (mid-1989) may have become contaminated from standing in a contaminated confinement. The surface water remaining within the bermed area should be sampled before it is pumped into the holding tank. This sampling might preclude the possibility of contaminating the water in the holding tank with possibly higher concentrations of hazardous constituents. If the accumulated surface water is pumped into the holding tank before it is sampled, the water in the holding tank should be analyzed again before it is disposed off-site. At a minimum analytical parameters should include chromium and lead and it may be further necessary to test for all compounds listed on ~~U.S. EPA Contract Laboratory Program's Target Compound List~~. *RCHA Appendix 1X List*

Table 2 lists all SWMUs, operational dates, release history and suggested further actions.

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OHIO ENVIRONMENTAL PROTECTION AGENCY
DATA MANAGEMENT SECTION

TSD/LDF CHANGE OF UNIVERSE FORM

Please note that LDF changes are done only with U.S. EPA and State Agency concurrence; TS or Incinerator universes are updated as per Ohio EPA's determination. Codes given are as per the Data Element Dictionary of RCRIS.

DATE TO USEPA: 9/29/94

DATE ENTERED RCRIS: 1/18/95

USEPA Contact Name/Phone

Maria T. Velalis / 614/644-2939

OEPA Contact Name/Phone

BASIC INFORMATION

USEPA ID NO.: OH D986971422

Name of Facility:

Milco Properties

Facility Address:

777 Dearborn Park Lane

Worthington
City

OH 43085
State Zip Code

UNIVERSE INFORMATION

A. Applicable Universes
(circle one or more):

CURRENT: TS INCIN (LDF) LQG SQG VSQG TRN
CHANGE TO: TS INCIN LDF LQG SQG VSQG TRN (N)

B. TSD Regulatory Status
Use one of the following:

R - Regulated
N - Non Regulated

P - Pending
A - Regulated under another ID number

If select N in the CHANGE TO: status, select ONE of the following
TSD regulatory status descriptions:

CURRENT: R
(R,N,P,A)

CHANGE TO: N
(R,N,P,A)

if CHANGE TO: N 5
(select from below)

- 1 - The only hazardous waste received is from an exempt SQG
- 2 - Definitionally excluded wastes
- 3 - Delisted wastes
- 4 - Uses only exempt handling methods

- 5 - Closure / Post-Closure
- 6 - Less than 90 day storage
- 7 - Regulated under another ID number

PROCESS INFORMATION

Instructions: Please circle the appropriate choices and fill in the blank data areas.

A. Process Code Changes (see Table 1 for applicable codes and units of measure):

ADD/DELETE
(Circle One)

A D

A D

A D

A D

#1

#2

#3

#4

Process Code:

Amounts:

Unit of Measure:

Process Code Status:

(Select from below)

- U - Submitted on Part A, unverified
- B - Submitted on Part A, subsequently verified as actually existing
- L - Submitted on Part A, determined not to exist as a result of a subsequent investigation
- R - Not submitted on Part A, found to exist as a result of a subsequent investigation

- N - Permitted, not yet under construction
- C - Permitted, under construction
- O - Previously operated, regulated. Now unregulated.

B. Source Record (Circle One)

EPA

STATE

C. Date of Source Record

(Date of inspection / date determination made by EPA/State)

____/____/____

COMMENTS:



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor
Donald R. Schregardus
Director

September 26, 1991

Re: Millco Construction Company/
BancOhio National Bank
US EPA ID No.: OHD986971422
Completion of Closure 9

Ms. Marion Gerhardt
National City Corporation
3700 First National Tower
Louisville, Kentucky 40202

Dear Ms. Gerhardt:

The Ohio EPA (OEPA) has received the Closure Certification Report and the June 11, 1991 Supplemental Certification Report for the hazardous waste pile which was located at 777 Dearborn Park Lane, Columbus, Ohio. The OEPA, Central District Office conducted a certification of closure inspection on May 9, 1991. After reviewing the sample results submitted with the closure report, it has been determined that the "clean" levels or action levels stated in the closure plan approved by the OEPA on October 26, 1990 have been met for closure of the hazardous waste pile at 777 Dearborn Park Lane, Columbus, Ohio. However, because contaminated soil was improperly disposed of, the closure cannot be considered to have been completed in accordance with the approved plan (see attached letter). Millco Construction Company/BancOhio National Bank will no longer be considered a Treatment, Storage & Disposal Facility (TSD) and will hold the status of a non-generator of hazardous waste. The hazardous waste ID number (OHD986971422) assigned to 777 Dearborn Park Lane, Columbus, Ohio should continue to be used for OEPA manifest, recordkeeping and reporting requirements for former TSD's, current non-generators of hazardous waste or specific conditions regarding Millco Construction Company/BancOhio National Bank.

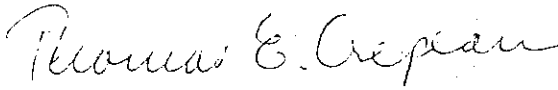
If you have any questions concerning your current status, please contact the Ohio EPA, Central District Office, Attn: Jennifer Hille, 2305 Westbrooke Dr., Bldg. C, Columbus, Ohio 43228, tel.: (614) 771-7505.

Nothing in this letter shall be construed so as to release Millco Construction Company/BancOhio National Bank from any liability they may have pursuant to Ohio Revised Code Sections 3734.20 through 3734.27 for remedial, corrective action, monitoring and/or testing that may need to be conducted at the Bedford Landfill. Moreover, this letter does not relieve Millco Construction Company/BancOhio National Bank of any corrective action responsibilities that may be required at 777 Dearborn Park Lane, Columbus, Ohio.

Millco Construction Company/
BancOhio National Bank
Completion of Closure
Pg. 2

Should you have further questions concerning this procedure,
please contact Randy Sheldon of my staff at the letterhead
address or by telephone at (614) 644-2977.

Very truly yours,



Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

TEC/rs

cc: Kevin Pierard, US EPA, Region V
Lisa Pierard, US EPA, Region V
Laurie Stevenson, HW ES, DSHWM
Randy Meyer, RCRA TAS, DSHWM
Jeff Mayhugh, HW ES, DHWM
Carolyn Reiersen, HW ES, DHWM
Beth Harris, DMS, DHWM
Jennifer Hille, DHWM, CDO
Shane Farolino, Env. Enf., AGO
File



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1500 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

EMEL
RCRIS
LDF
FAD

George V. Voinovich
Governor

Donald R. Schregardus
Director

September 26, 1991

Re: Millco Construction Company/
BancOhio National Bank
US EPA ID No.: OHD986471422
Completion of Closure

Ms. Marion Gerhardt
National City Corporation
3700 First National Tower
Louisville, Kentucky 40202

RECEIVED

OCT 24 1991

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Dear Ms. Gerhardt:

The Ohio EPA (OEPA) has received the Closure Certification Report and the June 11, 1991 Supplemental Certification Report for the hazardous waste pile which was located at 777 Dearborn Park Lane, Columbus, Ohio. The OEPA, Central District Office conducted a certification of closure inspection on May 9, 1991. After reviewing the sample results submitted with the closure report, it has been determined that the "clean" levels or action levels stated in the closure plan approved by the OEPA on October 26, 1990 have been met for closure of the hazardous waste pile at 777 Dearborn Park Lane, Columbus, Ohio. However, because contaminated soil was improperly disposed of, the closure cannot be considered to have been completed in accordance with the approved plan (see attached letter). Millco Construction Company/BancOhio National Bank will no longer be considered a Treatment, Storage & Disposal Facility (TSD) and will hold the status of a non-generator of hazardous waste. The hazardous waste ID number (OHD986971422) assigned to 777 Dearborn Park Lane, Columbus, Ohio should continue to be used for OEPA manifest, recordkeeping and reporting requirements for former TSD's, current non-generators of hazardous waste or specific conditions regarding Millco Construction Company/BancOhio National Bank.

If you have any questions concerning your current status, please contact the Ohio EPA, Central District Office, Attn: Jennifer Hille, 2305 Westbrooke Dr., Bldg. C, Columbus, Ohio 43228, tel.: (614) 771-7505.

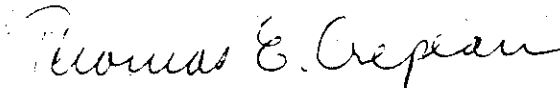
Nothing in this letter shall be construed so as to release Millco Construction Company/BancOhio National Bank from any liability they may have pursuant to Ohio Revised Code Sections 3734.20 through 3734.27 for remedial, corrective action, monitoring and/or testing that may need to be conducted at the Bedford Landfill. Moreover, this letter does not relieve Millco Construction Company/BancOhio National Bank of any corrective action responsibilities that may be required at 777 Dearborn Park Lane, Columbus, Ohio.



Millco Construction Company/
BancOhio National Bank
Completion of Closure
Pg. 2

Should you have further questions concerning this procedure,
please contact Randy Sheldon of my staff at the letterhead
address or by telephone at (614) 644-2977.

Very truly yours,



Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

TEC/rs

cc: Kevin Pierard, US EPA, Region V
Lisa Pierard, US EPA, Region V
Laurie Stevenson, HW ES, DSHWM /
Randy Meyer, RCRA TAS, DSHWM
Jeff Mayhugh, HW ES, DHWM
Carolyn Reiersen, HW ES, DHWM
Beth Harris, DMS, DHWM
Jennifer Hille, DHWM, CDO
Shane Farolino, Env. Enf., AGO
File



State of Ohio Environmental Protection Agency

Central District Office

Street Address:
2305 Westbrooke Drive, Building C
Columbus, Ohio 43228
614-771-7505 FAX 614-771-7571

Mailing Address:
P.O. Box 2198
Columbus, Ohio 43266-2198

George V. Volnovich
Governor

June 10, 1991

RE: MILLCO CONSTRUCTION COMPANY/
BANCOHIO NATIONAL BANK
FRANKLIN COUNTY
OHD986971422

Mr. Robert Miller
4378 Tuller Road
Dublin, Ohio 43017

Dear Mr. Miller:

The Ohio EPA has received the Closure Certification Report for the hazardous waste pile which was located at 777 Dearborn Park Lane, Columbus, Ohio. The Central District Office conducted a certification inspection on May 9, 1991. After reviewing the sample results submitted with the closure report, it has been determined that the "clean" levels or action levels stated in the closure plan approved by the Ohio EPA on October 26, 1990 have been met. However, because hazardous waste contaminated soil was unlawfully disposed of at the unpermitted Bedford Landfill in Gahanna, Ohio, instead of at a permitted hazardous waste facility as specified in the closure plan approved on October 26, 1990 for the Millco facility, the closure cannot be considered to have been conducted in accordance with the approved plan. Except for the unlawful disposal of hazardous waste contaminated soil (at the Bedford Landfill) closure was conducted in accordance with the approved closure plan. Since the Ohio EPA will not require the Millco Construction Company to remove the soil disposed of at the Bedford Landfill at this time, the qualified certification appears to be acceptable to Ohio EPA. A final letter concerning certification of closure for this hazardous waste pile will be forwarded from the Central Office of the Division of Solid and Hazardous Waste Management.

Nothing in this letter shall be construed so as to release the Millco Construction Co. from any liability it may have pursuant to Ohio Revised Code Sections 3734.20 through 3734.27 for remedial or corrective action or monitoring or testing that must be conducted at the Bedford Landfill.

If you should have any questions, feel free to call our office at (614) 771-7505.

Sincerely,

Jennifer Hille

Jennifer Hille
Division of Solid and Hazardous Waste Management
Central District Office

JH/sc

cc: Tom Crepeau, DSHWM, CO
Randy Meyer, DSHWM, CO
Jeff Mayhugh, DSHWM, CO
Shane Farolino, AGO
Marion Gerhardt, National City Corporation

RECEIVED
OHIO EPA

JUN 11 1991

DIV OF SOLID & HAZ. WASTE MGT.



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